

The Retzer Group

Of

Polar Investment Counsel, Inc.

Brokers and Investment Advisors; Member NASD, NFA, MSRB, SIPC

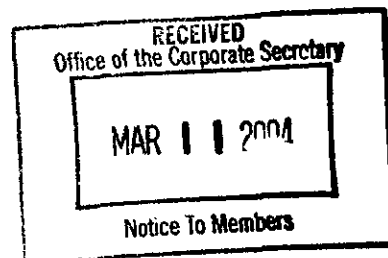
1140 Auburn Dr
Brookfield WI 53045
(262) 794-0672 · (262) 794-0673 FAX
E-mail address: pretzer@polarinvest1.com

Patrick Retzer

Branch Manager

Securities Accounts Cleared Through:
Southwest Securities, Inc. Member NYSE

Futures Accounts Cleared Through:
Iowa Grain Company



March 5, 2003

Ms. Barbara J. Sweeney
NASD
Office of the Corporate Secretary
1735 K Street, NW
Washington, DC 20006-1500

Re: NTM 04-07 Commodity Trading Advisors

Dear Ms. Sweeney:

I am responding to the request for comments solicited in NTM 04-07 concerning the trailing commissions on various commodity pool products.

I have been a registered rep for over 15 years, a registered investment advisor rep, and a portfolio manager or co-manager of four different mutual funds, totaling over \$1 billion in size. I am also a Certified Public Accountant and have a Master's in Taxation.

I am opposed to the elimination, reduction or limitation of trailing commissions on futures pools for several reasons. The primary reason is that such action **would only** further limit the small individual investors' access to and utilization of this excellent product line, much to **their detriment**.

Endless studies document the value of managed futures pools, both in terms of increasing the performance and decreasing the overall volatility of an investment portfolio. Over the past several years, individual investors have experienced losses in the hundreds of billions of dollars, as they rode their aggressive equity funds down through the worst NASDAQ market in history. Most individual investors have no investment exposure to these commodity pools. This lack of exposure has cost them dearly.

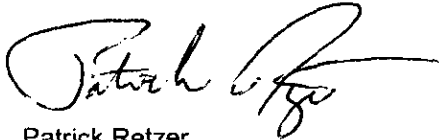
Despite the successful track record of many large commodity pools, most registered reps are not licensed to offer the product to their clients. Successfully implementing commodity pools into a client's portfolio takes not only additional licensing, but also substantial effort and expertise to sift through and analyze the various products as well as follow them on an ongoing basis.

Clearly, if the trailing commissions paid by these commodity pools were excessively lucrative or "too high," all too many registered reps would have their clients over-invested in this asset class. Instead, only a small fraction of registered reps have even obtained the required licenses and consequently, all too few individual investors have access to or representation in this excellent asset class.

Any action to eliminate, decrease or limit trailing commissions paid on commodity pools would only further decrease the willingness of registered reps to undertake the workload required to properly make these products available to investors. The obvious result would be that many investors looking for exposure to this asset class would resort to trading individual futures contracts, usually a losing proposition for unsophisticated investors, or would simply have a lower performing, less diversified portfolio.

The United States is the greatest country in the world for many reasons, one of which is the strong belief in free markets and free enterprise. Eliminating, decreasing or limiting trailing commissions on commodity pools is one more step away from those principles. Let the client and the markets decide whether the trailing commissions are currently too high.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Retzer", with a stylized flourish at the end.

Patrick Retzer
Polar Investment Counsel, Inc.

Home Office: Burlington WI (262) 537-2200

ADDITIONAL INFORMATION IS AVAILABLE UPON REQUEST. The information expressed herein has been obtained from sources believed reliable, but is not necessarily complete and cannot be guaranteed. Any opinions expressed are those of the writer and are subject to change without notice.