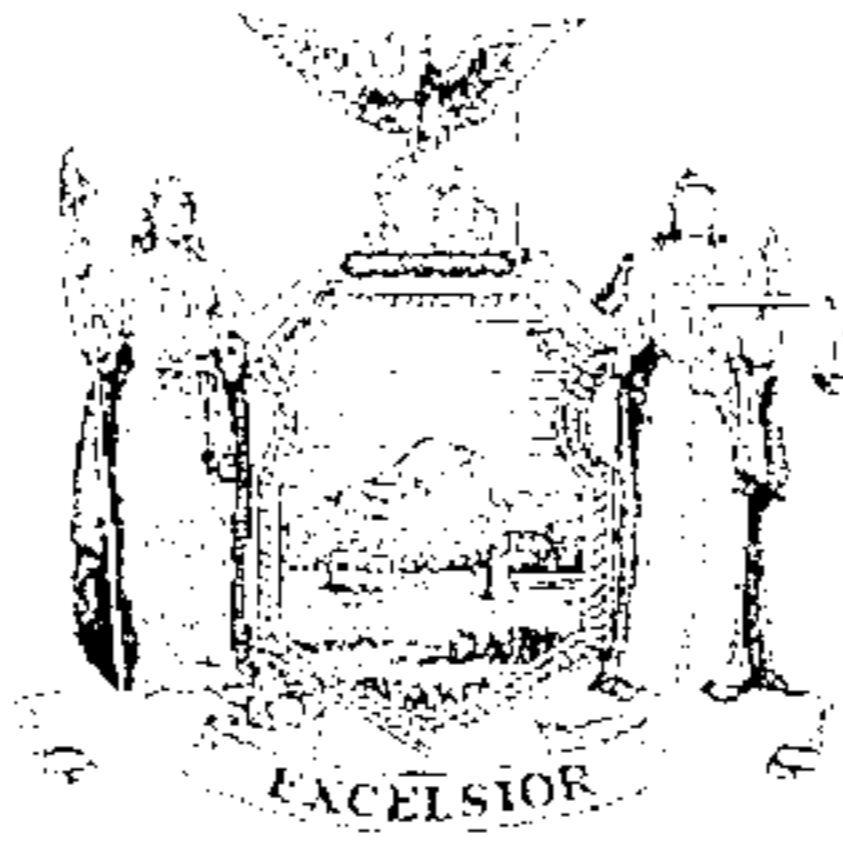


THOMAS P. DiNAPOLI
STATE COMPTROLLER



110 STATE STREET
ALBANY, NEW YORK 12236

STATE OF NEW YORK
OFFICE OF THE STATE COMPTROLLER

September 6, 2011

Niels Holch, Executive Director
Coalition of Mutual Fund Investors
400 North Capitol Street, NW, Suite 585
Washington, DC 20001

Dear Mr. Holch:

Thank you for your letter dated August 4, 2011 regarding the Omnibus Accounting Practice and 529 College Savings Plans. Comptroller DiNapoli has asked me to respond.

I appreciate your providing the comments and perspective of the Coalition of Mutual Fund Investors (CMFI). Please be assured my office is aware of this situation and is watching the marketplace closely for further developments.

Please feel free to share any further updates you have on this matter with me at the address above.

Sincerely,

A handwritten signature in cursive script that reads "Brenda F. Smith".

Brenda F. Smith
Director
NYS 529 College Savings Program