

MEMO# 31599

February 5, 2019

Member Input Requested to Inform ICI Comments on SEC Public Company Reporting Regime; Conference Call on February 21

[31599]

February 5, 2019 TO: SEC Rules Committee RE: Member Input Requested to Inform ICI Comments on SEC Public Company Reporting Regime; Conference Call on February 21

In December, the Securities and Exchange Commission issued a request for public comment on the content and frequency of earnings releases and quarterly reports from public reporting companies.^[1] Of particular relevance to ICI and its members, the release asks about the potential “downstream” effects on investment companies and investment advisers from any changes to reporting frequency. A brief discussion of the SEC request for comment is attached to this memorandum.

ICI intends to submit a letter to the SEC on or before the comment deadline (March 21). Our letter will seek to inform the Commission about how regulated funds use the information currently provided in public company quarterly reports and earnings releases in their investment processes. While we do not envision supporting any decrease in the frequency of corporate reporting, we would like to help the SEC consider how reporting can be improved by focusing the Commission on information that is important to funds and their investment advisers.

The views of investment professionals within your firm will be very valuable in developing ICI’s comments on the release. For this reason, we would appreciate your help in eliciting those views. You can do this by providing contact information for the appropriate person(s) within your firm to participate on an upcoming member call to discuss the release. Alternatively, you could solicit views from your colleague(s) and convey that information on the member call.

The call will be held on **Thursday, February 21 at 2 pm Eastern**. Please RSVP to Nadia Ishmael (nadia.ishmael@ici.org) if you or your colleague(s) plan to participate. An Outlook invitation with dial-in information will be sent to all participants.

Please contact Rachel (rgraham@ici.org or 202/326-5819) or Greg (smith@ici.org or

202/326-5851) with any questions or concerns.

Rachel H. Graham
Associate General Counsel

Gregory M. Smith
Senior Director, Fund Accounting and Compliance

[Attachment](#)

endnotes

[1] SEC, Request for Comment on Earnings Releases and Quarterly Reports, Release No. 33-10588; 34-84842 (Dec. 18, 2018), *available at* <https://www.sec.gov/rules/other/2018/33-10588.pdf>.

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