

MEMO# 19669

February 1, 2006

SEC NOTICE REMINDING INVESTMENT COMPANY REGISTRANTS TO INCLUDE SERIES AND CLASS IDENTIFIERS IN EDGAR FILINGS BEGINNING FEBRUARY 6

©2006 Investment Company Institute. All rights reserved. Information may be abridged and therefore incomplete. Communications from the Institute do not constitute, and should not be considered a substitute for, legal advice. [19669] February 1, 2006 TO: SEC RULES MEMBERS No. 13-06 SMALL FUNDS MEMBERS No. 11-06 VARIABLE INSURANCE PRODUCTS ADVISORY COMMITTEE No. 1-06 RE: SEC NOTICE REMINDING INVESTMENT COMPANY REGISTRANTS TO INCLUDE SERIES AND CLASS IDENTIFIERS IN EDGAR FILINGS BEGINNING FEBRUARY 6 The SEC recently issued a notice to investment companies reminding them to obtain series and class (or contract) identifiers and include them in EDGAR filings beginning February 6, 2006.¹ Filers who filed their latest registration statement or amendment on Form N-1A, N-3, N-4, or N-6 must obtain and include identifiers in specified filings.² On and after February 6, filing types that are required to include identifiers will be suspended if they do not include identifiers or include identifiers not associated with the particular registrant. The recently issued notice describes where to obtain identifiers and provides a telephone number for investment company-related inquiries. Gregory M. Smith Director - Operations/Compliance & Fund Accounting 1 The notice is available at <http://www.sec.gov/info/edgar/ednews/seriesclassnotice.htm>. For additional information see Institute Memorandum to SEC Rules Members No. 87-05, Small Funds Members No. 65-05, Variable Insurance Products Advisory Committee No. 5-05 [No. 19038], dated July 26, 2005 describing SEC adoption of rule amendments requiring series and class identifiers. See also Investment Company Act Release No. IC-26990 (July 18, 2005) ("Adopting Release"). 2 EDGAR submission types that must include the identifiers are listed in the EDGAR Filer Manual and in footnote 32 of the Adopting Release.