

MEMO# 18510

February 8, 2005

POSSIBLE ICI RECOMMENDATIONS FOR REGULATORY IMPROVEMENTS TO BE DISCUSSED AT FEBRUARY 15TH SEC RULES COMMITTEE MEETING

[18510] February 8, 2005 TO: SEC RULES COMMITTEE No. 12-05 RE: POSSIBLE ICI RECOMMENDATIONS FOR REGULATORY IMPROVEMENTS TO BE DISCUSSED AT FEBRUARY 15TH SEC RULES COMMITTEE MEETING At the February 15th SEC Rules Committee meeting, we plan to discuss possible ICI recommendations to the SEC for regulatory changes to update or streamline existing requirements and eliminate burdens not justified by investor protections. To help generate discussion, we have assembled the attached preliminary list of possible proposals. The list is largely drawn from past ICI efforts of this type. It does not include topics that are already on the SEC's agenda and/or that we will pursue separately, such as amendments to Rule 12b-1 and reform of the disclosure regime for investment companies. At the February 15th meeting, we will request members' views on these proposals and on whether there are any others that we should consider submitting to the SEC. We also will discuss what our strategy should be going forward. If you will not be able to attend the February 15th meeting but would like to provide your views, please contact me at 202/326-5822 or frances@ici.org before February 15th. Frances M. Stadler Deputy Senior Counsel Attachment (in .pdf format)

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