

MEMO# 18179

November 9, 2004

SUBMISSIONS TO THE SEC STAFF REGARDING SELECTIVE DISCLOSURE OF PORTFOLIO HOLDINGS

[18179] November 9, 2004 TO: SEC RULES COMMITTEE No. 87-04 RE: SUBMISSIONS TO THE SEC STAFF REGARDING SELECTIVE DISCLOSURE OF PORTFOLIO HOLDINGS As discussed at the recent Committee meeting, the SEC staff intends to publish interpretive guidance on the new requirements relating to the selective disclosure of portfolio holdings. Funds must comply with these requirements in all initial registration statements and post-effective amendments filed on or after December 5. It is not clear at this time when the staff plans to publish this guidance. Both Fidelity Investments and T. Rowe Price Associates, Inc. have submitted proposed guidance for the staff's consideration. Attached for your information are copies of the two submissions. Please do not distribute these submissions outside your firm. Rachel H. Graham Assistant Counsel Attachments Attachment no. 1 (in .pdf format)

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