

MEMO# 14188

November 30, 2001

POSSIBLE SUBMISSION OF REGULATORY PROPOSALS TO SEC

[14188] November 30, 2001 TO: CLOSED-END INVESTMENT COMPANY COMMITTEE No. 23-01 RE: POSSIBLE SUBMISSION OF REGULATORY PROPOSALS TO SEC In connection with plans to undertake a review of the federal securities laws, SEC Chairman Pitt has invited the industry to make recommendations for possible regulatory changes. In response, the ICI is developing a package of regulatory reform proposals for submission to the SEC. We are interested in your suggestions for any regulatory changes concerning closed-end funds that we should consider including. In a 1995 submission to the SEC, we recommended that interval funds be permitted to use distribution financing arrangements. Since then, interval funds have received exemptive relief to impose contingent deferred sales charges and asset-based sales charges. Please advise us as to whether we should seek codification of that relief and, if so, whether the conditions in the exemptive orders are appropriate. (Attached to this memorandum is a copy of our 1995 proposal and a recent exemptive application.) In addition, please provide us with any other suggestions for improvements to rules that affect closed-end funds. We would appreciate receiving any comments or suggestions by Friday, December 14th. You may provide them to the undersigned at 202/326-5824 (phone), 202/326-5827 (fax) or amy@ici.org (email), or to Ari Burstein at 202/371-5408 (phone), 202/326-5839 (fax) or aburstein@ici.org (e-mail). Amy B.R. Lancellotta Senior Counsel Attachment Attachment (in .pdf format)

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