

MEMO# 11307

October 13, 1999

DRAFT ICI COMMENT LETTER ON IRS REVENUE PROCEDURE 99-31 CONCERNING VOLUNTARY CORRECTION PROGRAMS

[11307] October 13, 1999 TO: PENSION COMMITTEE No. 59-99 SEPTEMBER 16TH
CONFERENCE CALL REGISTRANTS RE: DRAFT ICI COMMENT LETTER ON IRS REVENUE
PROCEDURE 99-31 CONCERNING VOLUNTARY CORRECTION PROGRAMS

Attached is a draft of the Institute's comment letter concerning Revenue Procedure 99-31. The draft letter was developed after a conference call discussion with interested members on September 16th. Please review the draft and contact me with any comments or suggestions. Note that we have identified in italics specific areas in the draft where we seek additional member input. Feel free, of course, to comment on other aspects of the draft as well. I can be reached by phone (202/326-5837), by e-mail (tkim@ici.org), or fax (202/326-5839). In addition, a conference call has been scheduled for Wednesday, October 27, 1999 at 2 p.m. EST to discuss the draft comment letter. If you would like to participate on this conference call, please fill out the response form below and send it to Daniel Ayers by Monday, October 25, 1999. If you have any questions, comments or particular issues you would like to raise on the call, please do not hesitate to call me at the number above. Thomas T. Kim Assistant Counsel Attachment Attendance Form for Institute Conference Call on Comment Letter to Rev. Proc. 99-31 Wednesday, October 27, 1999 at 2:00 p.m. EST Please fax this form by Monday, October 25, 1999 to Daniel Ayers at (202) 326-5839. Yes, I will participate on the Conference Call on Wednesday, October 27, 1999 at 2:00 p.m. EST. To participate in the call, dial (800) 523-5415 and ask for the Investment Company Institute call, confirmation number 2275216. Committee Member Company Phone