

MEMO# 1084

April 4, 1989

SEC ADOPTS INVESTMENT COMPANY ACT RULE 30B1-3 SPECIFYING FORM N- SAR FILING REQUIREMENTS FOR FUNDS THAT CHANGE THEIR FISCAL YEAR ENDS

April 4, 1989 TO: CLOSED-END FUND COMMITTEE NO. 8-89 SEC RULES COMMITTEE NO. 19-89 ACCOUNTING/TREASURERS COMMITTEE NO. 14-89 INDEPENDENT ACCOUNTANTS ADVISORY GROUP RE: SEC ADOPTS INVESTMENT COMPANY ACT RULE 30b1-3 SPECIFYING FORM N-SAR FILING REQUIREMENTS FOR FUNDS THAT CHANGE THEIR FISCAL YEAR ENDS

On March 13, 1989, the Securities and Exchange Commission announced the adoption of Rule 30b1-3 under the Investment Company Act, which specifies transition reporting obligations for investment companies that change their fiscal year ends. The new rule requires an investment company that changes its fiscal year end to file a report on Form N-SAR within 60 days of either the close of the resulting transition period or the date of the determination to change the fiscal year end, whichever is later. The transition report filed by a management investment company must cover a period no longer than six months, and because the new rule does not specify the period the transition report must cover, an investment company in certain circumstance has a choice between two periods. Please refer to the appendix in the attached adopting release (section V.3) for examples of reporting under the amendments for a management investment company with a December 31 year end that changes its fiscal year. Rule 30b1-3 specifies that no filing fee is required for a transition report. The new rule is effective for an issuer's decision to change its fiscal year end made on or after April 12, 1989. Also please note that Rule 12b-25 and Form 12b-25 are amended to add transition reports to those reports (including Form N-SAR) for which an extension of time for filing is available. We will keep you advised of any developments. Donald J. Boteler Director of Operations/ Fund Accounting Attachment