

MEMO# 35967

December 23, 2024

ICI Sends Letter to SEC Chair Gensler, Requesting Extension of the Compliance Dates for the Names Rule Amendments

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TO: ICI Members
Investment Company Directors
Chief Compliance Officer Committee
Disclosure Working Group
Fund Names Rule Implementation Working Group
SEC Rules Committee
Small Funds Committee SUBJECTS: Compliance
Disclosure
Investment Advisers
Operations
Portfolio Oversight RE: ICI Sends Letter to SEC Chair Gensler, Requesting Extension of the Compliance Dates for the Names Rule Amendments

The SEC adopted amendments to the Fund Names Rule in September 2023 ("Amendments").[\[1\]](#) The compliance dates for the Amendments are currently December 11, 2025 for larger entities and June 11, 2026 for smaller entities.

Today, ICI submitted a letter (linked below) to SEC Chair Gensler, requesting that the SEC (i) extend the compliance dates of the Amendments by at least 18 months, and (ii) base the compliance dates on a fund's fiscal year-end. We state in the letter that extending and amending the compliance dates in this way will provide funds with adequate time to complete implementation in an orderly manner, including incorporating expected, but not yet issued, staff FAQs. We also state that this will allow the incoming administration the opportunity to appropriately determine whether and how to address the substantive challenges and complexities the Amendments present. Finally, we state that these changes will allow all funds—irrespective of their fiscal year-ends—a full compliance period to update their disclosures while avoiding costly and disruptive off-cycle filings, all to the ultimate benefit of fund investors.

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Associate General Counsel - Securities Regulation

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Assistant General Counsel

Notes

[1] See [Investment Company Names](#), SEC Release No. 33-11238 (Sept. 20, 2023). ICI's [Fund Names Rule Resource Center](#) contains more information about the Names Rule, as amended in 2023.

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