

COMMENT LETTER

September 3, 2020

ICI Supplemental Comment Letter on SEC's Fund Names Rule (pdf)

1 2 3 1 2 . 3 2 3 4 5 6 7 4 5 6 7 3 3 8 * * * We appreciate the opportunity to provide these additional comments on the framework for addressing names of registered investment companies and BDCs. If you have any questions, please contact me at (202) 326-5813 or Dorothy M. Donohue, Deputy General Counsel Securities Regulation, at (202) 218-3563, or our counsel, Corey F. Rose at (202) 261-3314, or Aaron D. Withrow at (202) 261-3442, at Dechert LLP. Sincerely, /s/ Susan M. Olson Susan M. Olson General Counsel cc: The Honorable Jay Clayton The Honorable Hester M. Peirce The Honorable Elad L. Roisman The Honorable Allison Herren Lee The Honorable Caroline A. Crenshaw Dalia O. Blass Director, Division of Investment Management 8 §

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