

MEMORANDUM

April 12, 2007

TO: File No. S7-05-07

FROM: Alberto Zapata
Office of Disclosure Regulation
Division of Investment Management

RE: Extension of the Interactive Data Voluntary Reporting Program on the
EDGAR System to Include Mutual Fund Risk/Return Summary
Information – Release No. IC-27697

On April 12, 2007, Brent Fields, Assistant Director, Division of Investment Management, and Alberto Zapata, Senior Counsel, Division of Investment Management, participated in a telephone call with Kirk Botula, Chris Evans, and Greg Smith of Confluence to discuss comments made by Confluence in its comment letter dated March 14, 2007. In particular, the staff and the Confluence representatives discussed the comments concerning the use of taxonomy extensions and the submission of financial highlights as part of the voluntary program.