

**MEMORANDUM**

May 2, 2007

**TO:** File No. S7-05-07

**FROM:** Brent J. Fields  
Office of Disclosure Regulation  
Division of Investment Management

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

On May 2, 2007, Michael L. Rohan and Christy Rohrs of Rivet Software, Inc., met with Commission staff (J. Troy Beatty (Office of International Affairs), James M. Daly (Division of Corporation Finance), Brent J. Fields (Division of Investment Management), James Freeman (Office of Investor Education and Assistance), Linda Lee (Office of Information Technology), Joel Levine (Division of Corporation Finance), Brigitte Lippmann (Division of Corporation Finance), James Mayo (Office of Economic Analysis), Jeff Naumann (Office of the Chief Accountant), Susan Nash (Division of Investment Management), Cecile Peters (Division of Corporation Finance), David Plumlee (Office of the Chief Accountant), Carol Weiss (Division of Corporation Finance), Paul Wilkinson (Office of the Chairman), and Alberto Zapata (Division of Investment Management), to discuss rendering and analysis tools related to the voluntary interactive data program generally and such tools related to the risk/return summary taxonomy.