

Dr. Andrea C. Hall



October 8, 2009

Elizabeth M. Murphy, Secretary
Securities and Exchange Commission
100 F Street NE
Washington D.C. 20549-1090



Re: File Number S7-13-09

Dear Ms. Murphy:

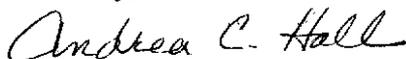
I am an independent director of the Kansas City based board that oversees mutual funds managed by American Century Investments. I am writing as chair of the Board's Governance Committee.

At our most recent meeting, the Governance Committee discussed the Commission's proposed enhancements to director and nominee disclosure. In addition to proposing that investors be provided more information relating to the qualifications of directors and candidates, the Commission posed a number of questions for commenters' consideration. One question was of particular interest to our committee -- whether Item 407(c)(2)(v) of Reg. S-K should be amended to include disclosure in the area of diversity among the existing disclosure of qualifications that a nominating committee must consider when evaluating a nominee for a position on the board.

The independent directors on our board understand that the shareholders we represent are a diverse group. We serve all shareholders' interests and believe that there is value in reflecting shareholder diversity in the make up of the board. At present, our board has seven independent directors, including two women and one minority, from varied professions. We strongly believe that diversity of background, skills, race and gender brings broader perspective to our deliberations as a board. Our nominating process for new board members currently includes these diversity factors among the considerations for board membership. By doing so, we ensure that diverse candidates are included in the list of nominees.

We appreciate that diversity is one of several factors that contributes to the effectiveness of a board. In our case, we have found that, through embracing diversity, we reinforce our commitment to our shareholders. Even if disclosure of board diversity is not included in the final rule, we believe attention to diversity is certainly a best practice and we will continue to follow the practices and processes described above in our role as shareholder representatives.

Sincerely,



Andrea C. Hall
Governance Committee Chair