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File Number S7-04-18

Brent J. Fields Secretary Securities and Exchange Commission 100 F Street, NE Washington, DC 20549-1090

Sent via e-mail: rule-comments@sec.gov

May 17, 2018

Dear Mr. Fields,

AIMA's comments on the SEC proposal regarding Investment Company Liquidity Disclosure

The Alternative Investment Management Association Limited (AIMA)¹ welcomes the opportunity to submit this letter to the Securities Exchange Commission (SEC) in relation to its proposal regarding investment company liquidity disclosure.

AIMA supports the amendments to Form N-PORT including the repeal of the current requirement in Form N-PORT that funds publicly disclose aggregate liquidity classification information about their portfolios.

Yours sincerely,

Jiří Król

Deputy Chief Executive Officer Global Head of Government Affairs

AIMA, the Alternative Investment Management Association, is the global representative of the alternative investment industry, with more than 1,900 corporate members in over 60 countries. AIMA's fund manager members collectively manage more than \$2 trillion in assets. AIMA draws upon the expertise and diversity of its membership to provide leadership in industry initiatives such as advocacy, policy and regulatory engagement, educational programmes and sound practice guides. AIMA works to raise media and public awareness of the value of the industry. AIMA set up the Alternative Credit Council (ACC) to help firms focused in the private credit and direct lending space. The ACC currently represents over 80 members that manage \$500 billion of private credit assets globally. AIMA is committed to developing skills and education standards and is a co-founder of the Chartered Alternative Investment Analyst designation(CAIA) – the first and only specialised educational standard for alternative investment specialists. AIMA is governed by its Council (Board of Directors). For further information, please visit AIMA's website, www.aima.org.