

MEMORANDUM

April 10, 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 10, 2007, Brent Fields, Assistant Director, Division of Investment Management, and Alberto Zapata, Senior Counsel, Division of Investment Management, participated in a telephone call with Walter Hamscher, President and CEO, Standard Advantage, to discuss comments in his comment letter dated March 2, 2007. In particular, the staff and Mr. Hamscher discussed comments concerning encouraging participation in the expanded voluntary program, the use of taxonomy extensions, and the use of software tools.