MEMORANDUM

October 24, 2008

TO: File No. S7-12-08

FROM: Alberto Zapata

Office of Disclosure Regulation Division of Investment Management

RE: Interactive Data For Mutual Fund Risk/Return Summary –

Release No. 34-57942

During the week of July 14, 2008, Chad Gazzillo of the Division of Investment Management participated in a telephone call with Brent Oswald, a Partner of KPMG LLP, in which auditor obligations regarding the above-referenced proposal were discussed.