Securities and Exchange Commission
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Washington, DC 20549-1090
United States
www.sec.gov

Chris Barnard

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- 17 CFR Parts 232, 270 and 274
- Release No. 33-11067; 34-94981; IC-34593; File No. S7-16-22
- Investment Company Names

Dear Sir.

Thank you for giving us the opportunity to comment on your proposed rule on Investment Company Names.

The SEC is proposing to amend the rule under the Investment Company Act of 1940 (Investment Company Act) that addresses certain broad categories of investment company names that are likely to mislead investors about an investment company's investments and risks. The proposed amendments to this rule are designed to increase investor protection by improving and clarifying the requirement for certain funds to adopt a policy to invest at least 80% of their assets in accordance with the investment focus that the fund's name suggests, updating the rule's notice requirements, and establishing recordkeeping requirements. The SEC also is proposing enhanced prospectus disclosure requirements for terminology used in fund names, and additional requirements for funds to report information on Form N-PORT regarding compliance with the proposed names-related regulatory requirements.

The topic of fund names is incredibly important for retail investors as the fund name is a primary driver of searching for and engaging with a retail investment opportunity. I support that for any fund name with terms suggesting that the fund focuses in investments that have, or investments whose issuers have, particular characteristics must hold at least 80% of their assets in securities indicated by the name. For index funds and funds investing in derivatives I would rather support an economic consideration that would look through the notional value of assets held in order to determine the economic impact of the fund exposures.

I strongly support the proposal to adopt a scoping requirement that does not distinguish between types of investments and investment strategies. Investors may not make a distinction between investment strategies and types of investments when assessing fund names in making an investment decision.

Regarding the growing area of ESG investments and strategies, I would strongly support a principles-based approach that would need to be addressed by the fund's documented investment policy, which should consider, for example, the impacts of investment decisions on sustainability factors and the manner in which sustainability risks are integrated into investment decisions. The aim here should be to prevent greenwashing, and to manage the reasonable expectations of retail investors. Naturally, funds using ESG or similar words should comply with the 80% rule.

Yours faithfully

C.R.B.

Chris Barnard