



Vanessa A. Countryman
Secretary
U.S. Securities and Exchange Commission
100 F St. N.E.
Washington, DC 20549
Re: Outsourcing by Investment Advisors (File No: S7-25-22)

Dear Secretary Countryman:

CSC Fund Services North America LLC has been in the US fund administration service business for 20 years and we have seen dramatic changes and growth in our industry over those decades. Our services include accounting and investor reporting for illiquid alternative asset management firms (aka private capital firms or RIAs), the funds they manage and their investors therein. Our firm has been on the forefront of the efforts behind improving the industry's vendor ecosystem, setting the bar high for vendor selections and management. We are proud to be part of the solution for our industry.

Regarding the proposed rule, although the Commission has indicated that the term covered function is defined more narrowly than all the functions an RIA may outsource, the currently proposed definition of a covered function remains overly broad. If retained, in its current form, we would urge the Commission to adopt a list of what it considers covered functions for clarity. This would permit RIAs to be all on a level playing field with clearly defined covered functions. Such clarity would also help outsourced service providers prepare to assist their clients in meeting such requirements.

Additionally, within the proposed rule, there is a lack of clarity as to whether fund administration services should be considered a covered function. In the case of private funds, the expertise and technology lift inherent in the types of services provided by fund administrators, make it difficult to keep these functions in house for RIAs. This and the increasing desire of investors for transparency and independence lend support for, fund administration services to be considered covered functions. The need to capture and report data to investors is an important function of the RIA and a fund administrator sits at the heart of such functions.

Lastly, we request that the Commission reconsiders the guidance provided to RIAs and clarifies its expectations. There is a great deal of crossover on recent rule proposals on the subject of record keeping rules (such as proposals to provide annual audited financial statements and quarterly reporting of investors statements) that could impact services provided by fund administrators. Additional clarity would reduce redundancy and any confusion for RIAs and avoid further complicating the Advisers Act compliance process.

Thank you for your attention

Sincerely,

A handwritten signature in black ink that reads "Robert Reilly".

Robert Reilly
Director of Client Services
CSC Global Financial Markets