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30 APRIL
~~E~~ ~~1~~, 2019

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

Re: Comments to Proposed Rule 12d1-4, File Number S7-27-18

Secretary Fields:

Thank you for the opportunity to comment on the above-referenced proposed rule to streamline and enhance the regulatory framework related to funds that invest in other funds or "fund of funds." Although comprehensive in many respects, the proposal makes a critical omission by not addressing the closed-end fund industry and, in particular, abuse of the current rules by activist managers as they target closed-end funds.

As a closed-end fund board member and shareholder, I have witnessed this activity firsthand and the detrimental effects it has on a closed-end fund and its shareholders. Activist managers have increasingly been taking advantage of the existing regulatory framework by targeting a closed-end fund with the goal of a quick return without regard for the interests of its long term investors.

I join with other parties in urging the Commission to revise the proposal to implement protections against this activist investor activity. Not taking action to mitigate these abuses would be a missed opportunity jeopardizing the closed-end fund industry, many of its investors, and the securities markets as a whole.

Sincerely,

A. C. van Ekris