



21149

Form ADV-Y2K

OMB APPROVAL

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SEC File No.

NOTE:
This number must appear on all pages.

Adviser Name / Business Address Information

Adviser Name

Business Address (Line 1)

Business Address (Line 2)

City

State

Zip Code

Country

Name under which business is conducted, if different than above.

DBA Name

Contact Person Responsible For Filling Out This Form

First Name

Last Name

Title

(Area Code) Telephone Number

() -

E-Mail Address (if applicable)

For SEC Use Only

Month

Day

Year





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Contact Person Responsible For Filling Out This Form (continued)

Business Address (Line 1)

Business Address (Line 2)

City

State

Zip Code

Country

Execution

The undersigned represents that he or she is executing this Form on behalf of, and with the authority of, the registrant. (The person executing the Form does not necessarily have to be the contact person above.)

The undersigned and registrant represent that the information contained in this Form is current, true and complete to the best of his or her knowledge.

Date

 / /

Month

Day

Year

Adviser Name

By (Signature):

Printed Name

Title

ATTENTION:

Advisers are reminded that it is a violation of section 207 of the Advisers Act to willfully make any untrue statement of a material fact in any report filed with the Commission, or willfully to omit to state in any such report any material fact that is required to be stated in the Form.





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Form ADV-Y2K

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PART I. Instructions

1. If you are required to file Form ADV-Y2K, you must complete Part I. Complete Part I even if you also will be completing Part II because you are an adviser to an investment company.
2. Include in your answers to Part I your SEC-registered investment adviser affiliates that are not required to file this report.
3. Answer Part I with respect to all of your computer systems, including systems that service only investment company clients.
4. If you have computer systems for which you have made different amounts of progress in preparing for the Year 2000 problem, base your responses on a qualitative average of your systems. Give greater weight to mission-critical systems, and systems used for a large number of clients, than to other systems.
5. If your advisory firm has multiple lines of business, base your responses only on computer systems that support your advisory business. For example, if you are also a tax return preparation firm, you need not take into consideration computer systems used solely for preparing tax returns (even if you prepare some of the tax returns of your advisory clients), although you must consider a billing system used to bill both advisory and tax preparation clients.
6. If more than one answer to a question is applicable, mark all answers that apply.
7. When marking the answer(s) to each question, shade circles like this: Not like this:

PART I. Information on Preparations by Investment Advisers for the Year 2000 Problem

1. Year 2000 compliance plan

(a) Do you have a plan for Year 2000 compliance to address whether your computer systems will operate correctly after December 31, 1999?

- Yes No *Consider as a plan, or as part of a plan, contacts with third parties upon whom you rely for systems you use.*

If the answer to question 1(a) is Yes, answer questions 1(c) through 1(i) and then go on to question 2.

If the answer to question 1(a) is No, answer question 1(b) below and then go on to question 2.

(b) If you do not have a plan, then are you:

Developing a plan. Expected date it will be completed by: Month Day Year
 / /

Not developing a written plan because you do not plan to be conducting business after January 1, 2000.
 Date you expect to be out of business by: Month Day Year
 / /

Other (please specify on a separate attachment)

(c) Does the plan address external interfaces with third party computer systems that communicate with your systems?

- Yes No

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PART I. Information on Preparations by Investment Advisers for the Year 2000 Problem (continued)

1. Year 2000 compliance plan (continued)

(d) Is your Year 2000 compliance plan in writing?

- Yes No

(e) Who has approved the plan? (mark all that apply)

- No approval Corporate officers Head of Information Technology or equivalent
- Board of directors Executive management Employees

(f) Has the plan been discussed with your outside auditors?

- Yes No

(g) What is the scope of coverage of the plan? (mark all that apply)

- All systems Mission-critical systems Physical facilities Communications systems

(h) Which of your facilities does the plan cover? (mark all that apply)

- Our primary facility All U.S. facilities All facilities worldwide
- Certain U.S. facilities Certain facilities worldwide We have no international facilities

(i) Are your activities for non-US clients covered by the plan?

- Yes No Not applicable

2. Funding for Year 2000 compliance

(a) Please indicate the month your fiscal year begins: [] (Example: '01' for January, '02' for February, etc.)

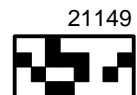
(b) Has specific funding been allocated for fiscal year 1998, fiscal year 1999, or fiscal year 2000, for your Year 2000 compliance plan?

If funding has not yet been allocated for fiscal year 1999 or fiscal year 2000, mark 'No'.
If you marked 'No' for 1998, 1999, and 2000, then go on to question 3.

- (i) 1998 Yes No
- (ii) 1999 Yes No
- (iii) 2000 Yes No

(c) What is your specific 1998 fiscal year budget allocation for Year 2000 compliance (including operating and capital expenditures)?

- Less than \$1,000 \$100,001 - \$500,000 \$5 - 10 million Over \$100 million
- \$1,001 - \$10,000 \$500,001 - \$1 million \$10 - 20 million
- \$10,001 - \$50,000 \$1 - 2 million \$20 - 50 million
- \$50,001 - \$100,000 \$2 - 5 million \$50 - 100 million



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PART I. Information on Preparations by Investment Advisers for the Year 2000 Problem (continued)

2. Funding for Year 2000 compliance (continued)

(d) What items are contained in your 1998 fiscal year budget for Year 2000 compliance? (mark all that apply)

- Assessment of the problem
- Point-to-point testing (including testing with broker-dealers, custodians, transfer agents and other service providers)
- Correction of systems
- Training
- Replacement of systems
- SIA industry-wide testing
- Internal testing
- Implementation of contingency plans

If you marked 'No' for 1999 and 2000 in question 2(b), then go on to question 3.

(e) What is your specific 1999 fiscal year budget allocation for Year 2000 compliance (including operating and capital expenditures)?

- Less than \$1,000
- \$100,001 - \$500,000
- \$5 - 10 million
- Over \$100 million
- \$1,001 - \$10,000
- \$500,001 - \$1 million
- \$10 - 20 million
- \$10,001 - \$50,000
- \$1 - 2 million
- \$20 - 50 million
- \$50,001 - \$100,000
- \$2 - 5 million
- \$50 - 100 million

(f) What items are contained in your 1999 fiscal year budget for Year 2000 compliance? (mark all that apply)

- Assessment of the problem
- Point-to-point testing (including testing with broker-dealers, custodians, transfer agents and other service providers)
- Correction of systems
- Training
- Replacement of systems
- SIA industry-wide testing
- Internal testing
- Implementation of contingency plans

If you marked 'No' for 2000 in question 2(b), then go on to question 3.

(g) What is your specific 2000 fiscal year budget allocation for Year 2000 compliance including operating and capital expenditures? Estimate if specific information is not yet available.

- Less than \$1,000
- \$100,001 - \$500,000
- \$5 - 10 million
- Over \$100 million
- \$1,001 - \$10,000
- \$500,001 - \$1 million
- \$10 - 20 million
- \$10,001 - \$50,000
- \$1 - 2 million
- \$20 - 50 million
- \$50,001 - \$100,000
- \$2 - 5 million
- \$50 - 100 million

(h) What items are contained in your 2000 fiscal year budget for Year 2000 compliance? (mark all that apply) Estimate if specific information is not yet available.

- Assessment of the problem
- Point-to-point testing
- Correction of systems
- Training
- Replacement of systems
- SIA industry-wide testing
- Internal testing
- Implementation of contingency plans

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PART I. Information on Preparations by Investment Advisers for the Year 2000 Problem (continued)

3. Persons responsible for Year 2000 compliance

(a) Has one or more individuals been designated as responsible for your Year 2000 compliance?

Yes No *Include both employees and consultants*

(b) If yes, provide the following information on the person primarily responsible:

Provide information for one person only.

First Name

Last Name

Title

Business Address (Line 1)

Business Address (Line 2)

City

State

Zip Code

4. Staffing for Year 2000

(a) Is this a full-time (or full-time equivalent) project for one or more individuals?

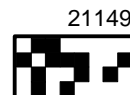
Yes No *Include both employees and third parties.*

(b) If yes, how many full-time (or full-time equivalent) individuals are working on Year 2000 compliance?

1 6-10 21-50 101-200
 2-5 11-20 51-100 Over 200

(c) Have you hired third parties to assist you on Year 2000 issues?

Yes No





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PART I. Information on Preparations by Investment Advisers for the Year 2000 Problem (continued)

4. Staffing for Year 2000 (continued)

(d) If yes, what function(s) are the third parties performing? (mark all that apply)

- Assessment of the problem
- Correction of systems
- Replacement of systems
- Internal testing
- Vendor assessment
- Point-to-point testing (including testing with broker-dealers, custodians, transfer agents and other service providers)
- Training
- SIA industry-wide testing
- Implementation of contingency plans
- Other

(e) If you have not completed staffing your Year 2000 project, are you:

- Defining resources -- expected date it will be completed by: [] / [] / []
Month Day Year
- Unable to find sufficient staffing resources
- Handling the staffing as part of your ongoing business operations

5. Inventory of systems

(a) Have you inventoried all of your systems?

- Yes
- No

(b) What is the nature of the computer systems you utilize? (mark all that apply)

- Off-the-shelf
- Vendor provided
- Developed in-house (custom made)
- Other

(c) Have you identified your mission-critical systems?

- Yes
- No

(d) If no, this is expected to be completed by: [] / [] / []
Month Day Year

(e) Have you determined which of your mission-critical systems are not currently Year 2000 compliant?

- Yes
- No

6. Awareness of the problem

What steps have you taken to enhance awareness of potential Year 2000 problems? (mark all that apply)

- None to date
- Designated individuals for Year 2000 compliance
- Presentations to the Adviser's Board
- Presentations to management
- Presentations to employees
- Contacted third parties
- Other

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PART I. Information on Preparations by Investment Advisers for the Year 2000 Problem (continued)

7. Progress on preparing mission-critical systems for the Year 2000

What is your progress, if any, on the following stages of preparation for the Year 2000?

(a) **Assessment of steps you expect to take to address Year 2000 problems with your mission-critical systems (including preparing an inventory of computer systems affected by the Year 2000 problem):**

- 0% complete
- 1 - 25%
- 26 - 50%
- 51 - 75%
- 76 - 99%
- Complete

If not completed, assessment expected to be completed by: / /
 Month Day Year

(b) **Implementation of steps you expect to take to address Year 2000 problems with your mission-critical systems:**

- 0% complete
- 1 - 25%
- 26 - 50%
- 51 - 75%
- 76 - 99%
- Complete

If not completed, implementation expected to be completed by: / /
 Month Day Year

(c) **Testing of your internal mission-critical systems:**

- 0% complete
- 1 - 25%
- 26 - 50%
- 51 - 75%
- 76 - 99%
- Complete

If not completed, testing expected to be completed by: / /
 Month Day Year

(d) **Did your testing of internal mission-critical systems result in material exceptions that remain unresolved as of this filing?**

- Yes
- No
- Not Applicable

(e) **Point-to-point testing of your mission-critical systems (including testing with broker-dealers, custodians, transfer agents and other service providers):**

- 0% complete
- 1 - 25%
- 26 - 50%
- 51 - 75%
- 76 - 99%
- Complete

If not completed, point-to-point testing expected to be completed by: / /
 Month Day Year

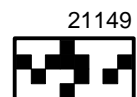
(f) **Did your point-to-point testing of internal mission-critical systems result in material exceptions that remain unresolved as of this filing?**

- Yes
- No
- Not Applicable

(g) **Implementation of tested software to address Year 2000 problems with your mission-critical systems:**

- 0% complete
- 1 - 25%
- 26 - 50%
- 51 - 75%
- 76 - 99%
- Complete

If not completed, implementation expected to be completed by: / /
 Month Day Year





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PART I. Information on Preparations by Investment Advisers for the Year 2000 Problem (continued)

8. Progress on preparing all other systems for the Year 2000

What is your progress, if any, on the following stages of preparation for the Year 2000?

(a) Assessment of steps you expect to take to address Year 2000 problems with your non-mission-critical systems (including preparing an inventory of computer systems affected by the Year 2000 problem):

- 0% complete, 1 - 25%, 26 - 50%, 51 - 75%, 76 - 99%, Complete

If not completed, assessment expected to be completed by: [Month] / [Day] / [Year]

(b) Implementation of steps you expect to take to address Year 2000 problems with your non-mission-critical systems:

- 0% complete, 1 - 25%, 26 - 50%, 51 - 75%, 76 - 99%, Complete

If not completed, implementation expected to be completed by: [Month] / [Day] / [Year]

(c) Testing of your non-mission-critical systems:

- 0% complete, 1 - 25%, 26 - 50%, 51 - 75%, 76 - 99%, Complete

If not completed, testing expected to be completed by: [Month] / [Day] / [Year]

(d) Did your testing of internal non-mission-critical systems result in material exceptions that remain unresolved as of this filing?

- Yes, No, Not Applicable

(e) Point-to-point testing of your non-mission-critical systems (including testing with broker-dealers, custodians, transfer agents and other service providers):

- 0% complete, 1 - 25%, 26 - 50%, 51 - 75%, 76 - 99%, Complete

If not completed, point-to-point testing expected to be completed by: [Month] / [Day] / [Year]

(f) Did your point-to-point testing of internal non-mission-critical systems result in material exceptions that remain unresolved as of this filing?

- Yes, No, Not Applicable

(g) Implementation of tested software to address Year 2000 problems with your non-mission-critical systems:

- 0% complete, 1 - 25%, 26 - 50%, 51 - 75%, 76 - 99%, Complete

If not completed, implementation expected to be completed by: [Month] / [Day] / [Year]





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PART I. Information on Preparations by Investment Advisers for the Year 2000 Problem (continued)

9. Contingency Plans

(a) Do you have a contingency plan for your systems if, after December 31, 1999, you have computer problems caused by the Year 2000?

- Yes No

(b) If yes, is the contingency plan in writing?

- Yes No

(c) If no, what is your progress in preparing a contingency plan?

- 0% complete 1 - 25% 26 - 50% 51 - 75% 76 - 99% Complete

If not completed, contingency plan expected to be completed by:

/ /
Month Day Year

(d) What is the scope of coverage of the contingency plan? (mark all that apply)

Include only internal systems and external systems that are individually related to the adviser.

- No systems Mission-critical systems Physical facilities Communications systems All systems

(e) Who has approved the contingency plan? (mark all that apply)

- No approval Corporate officers Head of Information Technology or equivalent
- Board of directors Executive management Employees

10. Third parties who provide mission-critical systems

(a) Have you identified all third parties upon whom you rely for your mission-critical systems?

- Yes No

(b) If yes, on how many third parties do you rely for your mission-critical systems:

(c) With what percentage of third parties upon whom you rely for mission-critical systems have you had contact regarding the third parties' readiness for the year 2000?

- 0% 1 - 25% 26 - 50% 51 - 75% 76 - 99% 100%

If not all, contact expected to be completed by:

/ /
Month Day Year





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PART I. Information on Preparations by Investment Advisers for the Year 2000 Problem (continued)

10. Third parties who provide mission-critical systems (continued)

(d) Has any third party on whom you rely for mission-critical systems declined or failed to provide you with assurances that it is undertaking the necessary steps to prepare for the Year 2000?

- Yes
- No
- Not Applicable

(e) If yes, what number of third parties providing mission-critical systems have failed to provide such assurances:

(f) Does your contingency plan account for third parties whose systems may fail after December 31, 1999?

- Yes
- No
- We have no contingency plan

11. Year 2000 preparations by companies whose securities you recommend

(a) In formulating advice given to clients as to the advisability of investing in, or continuing to hold, securities of particular issuers, do you take into account the extent to which the issuer has prepared for the Year 2000 problem?

- Yes
- No
- Not Applicable (not applicable to investment style)

(b) If yes, where does the adviser obtain information about issuers' preparedness?

- Representatives of issuers
- Reports filed with the SEC
- Publications
- Persons doing business with issuers
- Securities Analysts
- Other

12. Indicate the amount of your assets managed as reported in your last amended Form ADV (add the two amounts reported in Items 18B and 19B of Part I of Form ADV).

\$, , , (to the nearest whole dollar)

13. Questions related to Part II of this form

(a) Are you filing Part II of this form (see instructions for Part II)?

- Yes
- No

(b) If you are filing more than one version of Part II, because you advise funds in different fund families, how many versions of Part II are you filing?

