



Form ADV-Y2K

SEC File No.

NOTE: This number must appear on all pages.

PART II. Instructions

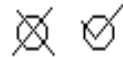
- 1. If you are an adviser or sub-adviser to an investment company registered under the Investment Company Act of 1940 ("fund") you must complete Part II with respect to that fund and any other fund in the same fund "complex" or "family" unless another adviser is submitting a Form ADV-Y2K that covers that fund.

Note: Under this instruction, if a fund complex has multiple advisers, the Commission expects that the adviser that sponsors or administers the fund complex would complete Part II. If neither the sponsor nor the administrator is a registered investment adviser, the advisers must decide among themselves which will complete and submit Form ADV-Y2K.

- 2. Answer Part II with respect to all computer systems used by the fund complex. If the complex has computer systems for which different amounts of progress in preparing for the Year 2000 problem have been made, base your responses on a qualitative average of the systems. Give greater weight to mission-critical systems than to other systems.
- 3. Include as third parties any other advisers or sub-advisers to the fund, or complex, on whose behalf you are filing Part II.
- 4. An adviser to (managed) insurance company separate accounts should limit its responses to the systems used to manage the account's portfolio. An adviser to funds serving as funding vehicles to insurance company separate accounts organized as unit investment trusts should limit its responses to the underlying funds and exclude systems used by the insurance company to administer the separate account.
- 5. If more than one answer to a question is applicable, mark all answers that apply.

- 6. When marking the answer(s) to each question, shade circles like this:

Not like this:



PART II. Information About Preparations by Investment Company Clients of Investment Advisers for the Year 2000

- 1. Identify the fund or funds, or the fund complex, on whose behalf you are filing this form. Provide the name and ten-letter identifier for the complex used in Item 19C of Form N-SAR, if available. If no answer to Item 19C was provided, provide the full name of the complex. If you are responding for multiple funds on this form, provide the name or names of the additional funds on a separate attachment.

(a) Name of fund or funds, or fund complex:

(b) Ten-letter identifier in Form N-SAR:

2. Year 2000 compliance plan

- (a) Does the fund you advise have a plan for Year 2000 compliance to address whether its computer systems will operate correctly after December 31, 1999?

Yes

No

Consider as a plan, or as part of a plan, efforts by the fund's board to monitor the activities of the fund's service providers.





52169

## Form ADV-Y2K

SEC File No.

**NOTE:***This number must appear on all pages.*

## PART II. Information About Preparations by Investment Company Clients of Investment Advisers for the Year 2000 (continued)

## 2. Year 2000 compliance plan (continued)

*If the answer to question 2(a) is No, answer question 2(b) below and then go on to question 3.*

(b) If No, then is the fund:

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

Not developing a plan because the fund does not plan to be conducting business after December 1, 1999.

Date the fund expects to be out of business by:  /  /   
 Month Day Year

Other (please specify on a separate attachment)

*If the answer to question 2(a) is Yes, answer questions 2(c) through 2(h) and then go on to question 3.*

(c) Is the Year 2000 compliance plan in writing?

Yes  No

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

No approval  Corporate officers  Head of Information Technology or equivalent  
 Fund's board of directors  Executive management  Employees

(e) Has the plan been discussed with outside auditors?

Yes  No

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

All systems  Mission-critical systems  Physical facilities  Communications systems

(g) Who had primary responsibility for preparing the Year 2000 plan?

The fund (or fund's board of directors)  A sub-adviser  A transfer agent  A broker-dealer  
 An adviser  An administrator  A custodian  Other

(h) Is the person or persons who have primary responsibility for preparing the Year 2000 plan the same person or persons completing the form?

Yes  No





SEC File No.

**NOTE:**  
This number must appear on all pages.

**PART II. Information About Preparations by Investment Company Clients of Investment Advisers for the Year 2000 (continued)**

**3. Persons responsible for Year 2000 compliance**

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

- Yes
- No *Include employees, employees of service providers (such as the adviser) and consultants*

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

<b>First Name</b>	<b>Last Name</b>	<b>Title</b>
<input type="text"/>	<input type="text"/>	<input type="text"/>

**Business Address (Line 1)**

**Business Address (Line 2)**

<b>City</b>	<b>State</b>	<b>Zip Code</b>
<input type="text"/>	<input type="text"/>	<input type="text"/>

**4. Inventory of systems**

(a) Has the fund had an inventory conducted of the systems it uses?

- Yes
- No

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

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

(c) Have the mission-critical systems used by the fund been identified?

- Yes
- No

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

(e) Has a determination for the fund been made as to which mission-critical systems it uses are not currently Year 2000 compliant?

- Yes
- No





SEC File No.

NOTE: This number must appear on all pages.

PART II. Information About Preparations by Investment Company Clients of Investment Advisers for the Year 2000 (continued)

5. Awareness of the problem.

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

- None to date
- Presentations to management
- Designated individuals for Year 2000 compliance
- Presentations to employees
- Presentations to the fund's board of directors
- Contacted third parties

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

What is the investment company's progress, if any, on the following stages of preparation for the Year 2000?

(a) Assessment of steps the fund expects to take to address Year 2000 problems with mission-critical systems it uses (including preparing an inventory of computer systems affected by the Year 2000):

- 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 the fund expects to take to address Year 2000 problems with mission-critical systems it uses:

- 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 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, testing of mission critical systems expected to be completed by:  /  /   
Month Day Year

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

- Yes
- No
- Not Applicable

(e) Implementation of tested software to address Year 2000 problems with 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





SEC File No.

**NOTE:**  
*This number must appear on all pages.*

**PART II. Information About Preparations by Investment Company Clients of Investment Advisers for the Year 2000 (continued)**

**7. Progress on preparing all other systems for the Year 2000**

What is the investment company's progress, if any, on the following stages of preparation for the Year 2000?

**(a) Assessment of steps the fund expects to take to address Year 2000 problems with non-mission-critical systems (including preparing an inventory of computer systems affected by the Year 2000):**

- 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 the fund expects to take to address Year 2000 problems with 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 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, testing expected to be completed by:

/  /   
 Month Day Year

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

- Yes
- No
- Not Applicable

**(e) Implementation of tested software to address Year 2000 problems with 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

**8. Contingency Plans**

**(a) Does the fund have a contingency plan for systems it uses if, after December 31, 1999, it has computer problems caused by the Year 2000?**

- Yes
- No

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

- Yes
- No





SEC File No.

NOTE: This number must appear on all pages.

PART II. Information About Preparations by Investment Company Clients of Investment Advisers for the Year 2000 (continued)

8. Contingency Plans (continued)

(c) What is the scope of coverage of the contingency plan? (mark all that apply) Include only systems that are individually related to the fund.

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

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

- No approval, Fund's board of directors, Corporate officers, Executive management, Head of Information Technology or equivalent, Employees

(e) If the fund has no contingency plan, what is the 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]

9. How often is the board of directors of the fund apprised of progress in the investment company's Year 2000 compliance efforts?

- Not informed, Weekly, Monthly, Quarterly, Annually, From time to time

10. Indicate the amount of assets that are covered by this report. Do not double-count assets in arrangements where one investment vehicle is a mere conduit for an investment in another fund (i.e., assets in a two-tier structure, such as a "master/feeder" structure or a unit investment trust that issues periodic payment plans or that is an insurance company separate account).

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

For SEC Use Only

Month [ ][ ] / Day [ ][ ] / Year [ ][ ][ ][ ]

