

August 3, 2009

Reference : FR2009-0608-0226/E

Org Id :00008408

REVIEW LETTER

1. Monitoring Report
Rule: 2210
31 pages

Fee: \$310

Total Fee: \$310

The filing fees identified above were charged previously and are listed here for informational purposes only.

We are in receipt of your letter dated June 30, 2009. Thank you for your prompt response. Based on the responses to our questions in our original review letter dated June 25, 2009, we have reviewed this material with the understanding that:

1. The investment report will be used by Plan Sponsors to monitor the investments that are part of their plans.
2. The criteria used to monitor the investments are derived from criteria selected by the Plan Sponsors.
3. The investment report will be used by Plan Sponsors and will not be available to retail investors.
4. The investment products that are monitored are generally registered mutual funds.

The material submitted appears consistent with applicable standards.

However, it is our understanding that this material will not be available to retail investors, if this is a misunderstanding, please let us know as comments will be necessary.

Sincerely,



Caroline J. Waugaman
Senior Analyst

jrk

***NOTE:** This review is limited to the communication that was filed. We assume that the communication does not omit material facts, contain statements that are not factual, or offer opinions that do not have a reasonable basis. This communication may be described as “Reviewed by FINRA” or “FINRA Reviewed”; however, there must be no statement or implication that this communication has been approved by FINRA.*