

- (b) the date on which such a decision was made and the length of time it took to acquire the position, or the point, as to extent of completion, at which it was decided to abandon the attempt to acquire the position. In the latter case indicate what further investment decision was taken as a result, and supply the requested information in respect to the largest position actually acquired during the period. If the largest position which it had been decided to take during the period was still in course of being acquired at the end of the period, indicate the point, as to extent of completion, at which the position stood at September 30, and supply the information previously called for in respect of the largest position actually acquired during the period.
 - (c) the extent to which different markets were used to acquire the position.
 - (d) information, similar to that called for in (a), (b) and (c) of this note, relative to the largest position it was decided to liquidate during the period. If such an attempt was unsuccessful or uncompleted, information as to the largest position actually liquidated should also be given. In the case of an uncompleted liquidation, supply details as to the extent of liquidation achieved at the end of the period and supply the details called for in respect of the largest position actually liquidated during the period.
37. In What stocks, held in the Company's portfolio as of September 30, 1958 are further purchases restricted by the "5 and 10 per cent" rule of Section 5 of the Investment Company Act of 1940 or by corresponding provisions of State "Blue Sky" Laws or the Internal Revenue Code?

Please list the relevant common stocks held by number of shares, market values, percentage relation to Company's total net assets and percentage relation to portfolio company's total voting securities.

38. (i) Is it the Company's policy to stipulate that "give-up" arrangements should apply to commissions on orders placed? What conditions normally give rise to such arrangements?
- i. e. (a) reciprocity to broker-dealers for the sale of the Company's own shares
- (b) reciprocity for investment advice from broker-dealers
- (c) other conditions
- (ii) What has been the usual proportion of the commission on each transaction which broker-dealers have given up?
- (iii) To what proportion of total purchase orders placed by dollar value and by numbers of orders have "give-up" conditions applied during the twelve months ended September 30, 1958?
39. Has the Company purchased by direct placement (other than rights issues) any corporate new security issues during the period January 1, 1953 to September 30, 1958?
- If so, state the types, prices and amounts purchased by direct placement in this period.
40. Describe any formula timing or other investment plans which are employed to determine, or as an adjunct to, the Company's investment decisions, or which have been so employed during the ten years ended September 30, 1958.

Please give details of the mode of operation of the plan, the means of detecting buying and selling points for securities and a description and examples of its effects on the size and structure of the portfolio during the period January 1, 1953 to September 30, 1958.

SECURITIES AND EXCHANGE COMMISSION

Investment Company Size Study Questionnaire
For Open-End CompaniesPART V

41. Name of Investment Company
42. (i) List the name of each portfolio company, 1 per cent or more of whose outstanding voting common stock was owned by any officer or director of the Company, or any individual or firm affiliated with it, as of September 30, 1958.
- (ii) For each of these portfolio companies, indicate the percentage of outstanding voting common stock held by each officer and director of the Company, and each individual and firm affiliated with it, who owned 1 per cent or more of such shares, as of September 30, 1958.
43. (i) Does the Company adhere to any general policies as to limits and objectives, with respect to the percentage of voting shares to be acquired in any one portfolio company (apart from the limits prescribed by the diversification provisions of the Investment Company Act of 1940, the Internal Revenue Code or the State "Blue Sky" Laws?
- (ii) What is the reason for such limits or objectives?
44. (i) What policy is followed by the Company in regard to directors, officers and employees holding positions as directors, officers and employees of portfolio companies?
- (ii) What policy is followed by the Manager and Investment Advisers to the Investment Company in regard to directors, officers and employees becoming directors, officers and employees of these portfolio companies?
45. Did the Company, or any affiliated individual or firm, participate in the organization of any concern listed in the Company's portfolio as of September 30, 1958? If so, list names of such companies and the dates on which they were organized.

46. (i) In the period since January 1, 1953 did any company in which the Investment Company held securities undergo a reorganization - bankruptcy or otherwise (while the Investment Company held such securities)?
- (ii) If so, describe in each instance:
- (a) the role played in the reorganization process by the Company, or by any individual or firm affiliated with it
 - (b) the effect of the reorganization on the security holdings of the Company
 - (c) the effect of the reorganization on the representation of the Company in the management of the portfolio company
47. (i) What general procedures and policies are followed by the Company in handling proxy solicitations involving portfolio companies?
- (ii) Are proxies always returned by the Company to the management proxy committee? Indicate the reasons for Company policy in this regard.
- (iii) List any instances since January 1, 1953, when proxies were returned to parties engaged in a proxy contest in opposition to the existing portfolio company management.
- (iv) For each case where proxies were returned to opposition groups, indicate the principal reasons for the Company's action.
- (v) Since January 1, 1953 has the Company, or any affiliated individual or firm, participated in the initiation of any proxy contest against the existing management of a portfolio company?
- Describe any cases of this kind.
- (vi) Prior to the inception of any of the proxy contests referred to in the questions above, were efforts made by the Company, or persons affiliated with it, to persuade the management of the portfolio company to alter its policies? If so, briefly describe these efforts.
- (vii) What was the outcome of each of the contests referred to in the questions above?
-

48. (i) List the portfolio companies whose 1957 annual meeting of shareholders was attended by a representative of the Company or of its Manager or Investment Advisers acting on behalf of the Company.
- (ii) What is the general policy of the Company with respect to attendance at the annual meetings of portfolio companies? Has this policy undergone any significant change since 1946? If so, indicate the reasons for this shift. What principal factors are taken into account in deciding whether or not to attend such meetings? Describe the more important instances in which Company attendance at such meetings was felt to be desirable.
- (iii) Do representatives of the Company regularly vote with the management when acting on proposals made at stockholders' meetings? If not, on what issues and in what manner (e. g., non-voting, voting in opposition, offering alternative proposals) has such opposition been asserted?
- (iv) Describe the extent to which portfolio companies are visited by representatives of the Company, including its investment analysts, Manager or Investment Advisers, during the periods between annual meetings. Indicate the general areas in which on such occasions the Company's opinions or comments are offered or sought.
49. (i) To what extent does the Company, or its affiliates, investigate and analyze proposals of minority stockholders submitted for action at the annual meeting of portfolio companies, and how frequently does it vote in favor of such proposals?
- (ii) Since January 1, 1953, has the Company voted against, otherwise opposed, or withheld approval from a stock option plan or any other executive compensation proposal advanced by the management of a portfolio company? If so, indicate briefly the details of the proposals opposed in each case.
- (iii) Since January 1, 1953 have representatives of the Company voted against or otherwise opposed changes in financial structure or in voting rights advanced by the management of a portfolio company? If so, describe details.
- (iv) Since January 1, 1953 has the Company acted in concert with other substantial stockholders in attempting to influence the managements of portfolio companies to adopt particular lines of action? If so, describe details.

50. NOTE: In the replies to the subquestions below, information is desired for both formal and informal offers of and requests for advice. "Formal" is to be understood as involving official communications, orally or in writing, between officers or directors of the Company (or its affiliates) and officers or directors of portfolio companies. Full information is expected only for cases of formal offers and requests; advice communicated on an informal basis need be referred to only where advice so conveyed appears to have influenced portfolio company policy.
- (i) Has the Company, or its Manager or Investment Advisers, offered advice to, or been consulted by, portfolio companies in connection with the types, terms and conditions of their security issues or other kinds of financing since January 1, 1953? If so, indicate the approximate frequency of such consultations, and give details concerning several such instances which occurred in recent years.
 - (ii) Has the Company, or its Manager or Investment Advisers, volunteered advice or been consulted in connection with merger plans involving one or more portfolio companies since January 1, 1953? If so, indicate the frequency of such consultations, the nature of Company recommendations in each case, and the final outcome of each such merger discussion.
 - (iii) Has the Company, or its Manager or Investment Advisers, volunteered advice or been consulted regarding the dividend policy of a portfolio company since January 1, 1953? If so, indicate the frequency of such consultations, the nature of the Company's recommendation in each case, and the dividend policy adopted by the portfolio company following each such consultation.
 - (iv) On what other matters (e. g. , selection of directors or officers), if any, has advice been offered to, or requested by, portfolio companies? Describe details in each case.