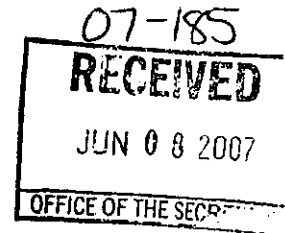


June 1, 2007



**CONFIDENTIAL TREATMENT REQUESTED**

Nancy M. Morris, Secretary  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549-1090

Re Notice of Representation Pursuant to Rule 8(b), 17 C.F.R. 200.735-8(b)

Dear Ms. Morris:

This statement is filed in compliance with the Securities and Exchange Commission's notice of representation requirement.

I was formerly Assistant Chief Counsel in the Division of Investment Management and resigned, effective April 27, 2007, to accept employment with the law firm of Stradley Ronon Stevens & Young LLP. This is to advise you that I have been retained to represent (b)(4) in connection with issues arising under section 18 of the Investment Company Act of 1940 and its application to The (b)(4) use of derivatives and other instruments that may create leverage (b)(4). The staff contact at the Commission is (b)(6). In the course of my representation of The (b)(4) it is contemplated that I will appear before, or communicate with, the Commission or the staff of various offices of the Commission by telephone, correspondence, or otherwise.

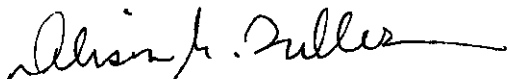
While an employee of the Commission, to the best of my recollection, I did not have official responsibility for, nor did I participate personally or substantially in, The (b)(4).

Ms. Nancy M. Morris  
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Because my participation in this matter may continue for an indefinite period involving more than one communication with, or appearance before, the Commission or its staff, this statement is intended to cover all my appearances and communications that relate directly to (b)(4)  
(b)(4).

In addition, I request confidential treatment for this letter because it refers to an ongoing nonpublic inquiry.

Very truly yours,



Alison M. Fuller