



Vanguard®

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October 19, 2006

Nancy Morris
Secretary
United States Securities and Exchange Commission
100 F Street N.E.
Washington, DC 20549

Re: Notice of Intent to Appear Pursuant to 17 C.F.R. §200-735-8

Dear Ms. Morris:

I was employed as the District Administrator of the Philadelphia District Office of the Securities and Exchange Commission from January 6, 2003 through October 29, 2005. Pursuant to 17 C. F.R. §200-735-8(b), I am notifying you that beginning on and after October 29, 2006, I intend to appear before the Commission and/or to communicate with its staff on behalf of Vanguard Group, Inc. (with its affiliated funds and companies collectively "Vanguard") with respect to a broad spectrum of regulatory matters of concern to Vanguard, including, but not limited to, pending and future applications for exemptive relief, if any; pending and future requests for no-action relief, if any; pending and prospective rulemaking or interpretive guidance; and enforcement and inspection matters affecting Vanguard, if any should arise. To the best of my knowledge, there were no matters involving Vanguard in which I participated personally and substantially during my tenure with the Commission. To the best of my knowledge there were only two matters involving Vanguard which were under my official responsibility during my tenure at the Commission (neither of which is ongoing), and none during the one year prior to my separation. None of the matters with respect to which I intend to represent Vanguard before the Commission or its staff is, or will be, a matter in which I participated personally and substantially, or which was under my official responsibility during the one year prior to my separation.

Sincerely,

Arthur S. Gabinet
Principal, Securities Regulation

cc: (b)(6)

[Redacted box]