

Written Testimony of **Mr. Harold Bradley**
Senior Vice President American Century Investment
Management

For a hearing on "Mutual Fund Industry Practices and their
Effect on Individual Investors", March 12, 2003

Before the House Subcommittee on Capital Markets, Insurance
And Government Sponsored Enterprises, Committee on
Financial Services

Introduction

Chairman Baker, Ranking Member Kanjorski, Members of the
Subcommittee, thank you for the invitation to share my views
on mutual fund industry trading practices, execution costs
and their effect on individual investors.

I am proud to be associated with the mutual fund
industry and its strong record as a stable, effectively
regulated and affordable place for U.S. investors. My
relationship with the industry is personal as most of my
investments are held in mutual funds. The three-year bear
market has been hard on all of us.

I represent American Century Investment Management. We
manage about \$70 billion for 1.5 million small investors and
institutional clients. I have worked there for 15 years and
served as portfolio manager, head of trading, and member of
the company's Investment Oversight Committee. I have
previously testified before congress in favor of
decimalization and on the effect of technology on stock
market structure. I have written numerous articles for
industry publications and speak frequently at industry

conferences addressing trading and portfolio management practices. I have served on committees of the Investment Committee Institute, the New York Stock Exchange and the NASDAQ stock market.

American Century, along with our industry, is now looking in the mirror to see what things we might do better. Nonetheless, we think that investors have been well served by mutual funds that offer professional money management, diversification and liquidity at very low cost to investors.

Commissions as Unreported Investment Manager Income

American Century has long recognized that the methods and costs for securities trading directly affect investment performance for our investors. We think Congress should work to understand how its law - section 28(e) of the 1975 Amendment to the Securities Exchange Act - encourages investment managers to **use commissions paid by investors as a source of unreported income to pay unreported expenses of the manager.**

Specifically, we think that commissions should be negotiated and disclosed as a percent of the dollar amount of each trade rather than as a per share charge, as is the practice in all other markets except for the U.S. and Canada. We think that investment managers should identify and disclose to investors (or the board's directors) the execution-only rate for each broker to make explicit the

perceived value of services beyond best execution. This should introduce true competition in trading costs that will benefit investors. We think that commissions used by investment managers to pay for goods and services customarily available to the general public for cash should be explicitly carried as a cost of managing money in a mutual fund's expense ratio.

Commissions and Stock Underwriting Practices

We also think the practices of stock underwriting should be reformed. Research and underwriting conflicts of interest have been based, in no small part, on quid pro quo arrangements available to the most generous commission payers. We recommend that IPOs be priced and allocated by Dutch auction pricing models, a method often used in public company buyback programs. The control over both pricing and allocation of new issues by investment bankers may appear to "rig" the game in favor of large company CEOs at the expense of both mutual fund investors and individuals, effectively undermining capital formation processes.

We also think that underwriters should publish the names of the recipients of the largest 50 allocations on the day after the underwriting, so investment managers can better assess whether our investors receive appropriate allocations based on the bundled commission rates charged by most

bankers. If we address these issues today, we can speed the healing of investor trust and confidence in our markets.

Section 28(e) and Its Effect on Investors

For some time, American Century has urged regulators and legislators to shine a bright light on burgeoning industry use of the Section 28(e) safe harbor.¹ The 1975 Amendment to the Securities Exchange Act allows investors to "pay up" for research services that benefit the investor, in the best judgment of the investment manager. The amount of commission that exceeds the lowest execution-only rate has been called soft dollars. Soft dollars may be "negotiated" in a number of ways. Some companies and clients prefer commission recapture programs whereby a broker will return 1c or so of "extra commissions" by check to investment managers and clients. Still others use so-called soft dollar converters who promise to pay \$1,000 of the investment manager's expenses for every \$1,600 of commissions directed to that broker, consistent with expectations of best execution. Most of these arrangements are not recorded on paper. Our tax people suggest that written contracts might trigger a requirement for accounting treatment of soft dollars by investment advisers.

¹ A 1989 Trader Forum bulletin quotes former SEC Director of Market Regulation Lee Pickard as saying: "There was some controversy at that time as to whether 28(e) should have been put on the books. There were people then, perceptive perhaps, who realized 28(e) was going to result in some abuses. But it's part of the law. The SEC can't change it by itself." **Institutional Investor**, "The Gray Areas of Directed Commission," 1989, p. 3.

In 1975, the idea of "paying up" was an abstract notion. Apple would not introduce the personal computer until 1982. Complex networks, commercial adoption of the Internet, and central data repositories were all a decade or more away. Today, the execution only cost of trading is readily identifiable and should be reportable.

Research Costs Six Times More Than Execution-Only

Last year, American Century traders executed more than 45% of its U.S. trading through mostly electronic, execution-only facilities at an average cost of about .85c per share. The average industry commission rate remains between 5.1c and 5.5c per share, according to Greenwich Associates (exhibit 1). That effective rate has changed little since 1991 despite a six-fold increase in trading volume because lower commission rates imply lower profits for both institutional money managers and their partners in the brokerage business (exhibit 2).

A reading of the legislative background of section 28(e) suggests that it was intended to keep fund managers out of regulatory hot water if they paid more than the lowest prevailing commission rate for services. But that was a different time. Industry practitioners feared that deregulated commissions would force a race to the bottom in price.

Lack of Visible Competition in Commission Rates

Recent reports indicate that while the average commission rate in cents per share has dropped marginally, commission costs have increased as a percent of total dollars (principal amount) traded.² The U.S. and Canada are the only marketplaces in the world that do not use percent of principal as a trading cost barometer. In U.S. trading, during periods of falling equity prices, fixed costs per share represent a higher portion of trading costs. In markets with rising prices, brokers encourage publicly traded companies to split their shares - effectively doubling the cost of trading for the same dollar amount of the company when fixed costs per share are used. There is no incentive for this kind of behavior in markets where commissions are calculated as a percent of the principal amount traded.

Commission rates, measured in cents per share, have moved very little since 1986 when the SEC liberalized its interpretation of research under section 28(e). Now the pool of equity trading volumes eligible for soft dollar use is expanding. At the end of 2001, the SEC expanded its interpretation of the safe harbor to cover "flat" riskless principal trades by market makers in NASDAQ securities. This action reversed a longstanding SEC position that such trades fell outside provisions of section 28(e). Decimalization and

electronic networks have pushed most of Wall Street away from principal market making in NASDAQ securities. As brokerage firms move to an explicit commission-based system for NASDAQ stocks, investment managers will likely access this new pool of available dollars for still more research and services.

We now have the systems and the data to create meaningful disclosures of these costs to investors. At best, insufficient disclosure provides investment managers little incentive to rationalize and manage the commissions, which are paid directly by investors. At its worst, section 28(e) allows some managers to boost profits during bad market conditions by paying more bills with investor commissions (exhibit 3). Greenwich Associates reported that a 27% decline in assets under management for the typical institutional manager in 2001 sharply reduced management fee income. Investment managers responded to the decline in assets, in part, by boosting soft dollar amounts paid by 17%, according to the self-reported study.³

A History of Worries About 28(e) and Investor Interests

It is interesting to review the regulatory history of section 28(e). The topic has been revisited every several years since 1975. Original interpretations of the statute by the Securities Exchange Commission did not permit a "safe harbor" for commissions used to purchase services

² Capital Research Associates report to American Century as of 12/31/2002.

³ **Greenwich Associates**, *A Closer Focus on Trading Costs*, April 2002

"customarily available to the general public."⁴ In 1986, after intense industry pressure, the SEC allowed that an investment advisor could use commissions and "pay up" for any service that assists him in making investment decisions on behalf of his clients.

Austin George, then head trader at T. Rowe Price, was quoted in 1989 as saying:

"And, then of course, what's happening is people are starting to work backwards through all those things that for years were ordinary and expected business expenses to see how they could recover their costs. This is my personal area of greatest concern - in terms of the industry, not T. Rowe Price - because you suddenly put the trader in the position of being a potential deterrent to enhancing the profitability of the firm."⁵

The SEC subsequently reopened debate on aspects of section 28(e) with the concept release called Market 2000, in 1992. The House Subcommittee on Telecommunications and Finance held hearings on this matter in July 1993. David Silfen, a Goldman Sachs partner, testified:

"[C]onflicts of interest are inherent in soft dollar arrangements. The money manager receives the products and services paid for by soft dollars. The client, often unknowingly, pays for these products and services as part of the brokerage commissions charged to his account. This situation presents an obvious temptation to the manager to buy items that benefit itself rather than the client, or items, such as general research reports, quotations services and computer hardware and software, that other managers consider their own responsibility under their basis management fee. The money manager may also pay too much in

⁴ **Institutional Investor**, *The Gray Areas of Directed Commissions*, 1989, p. 4.

⁵ **Institutional Investor**, *The Gray Areas of Directed Commissions*, 1989, p. 8.

commission or engage in unnecessary trading so as to generate more commission and thus more soft dollars."⁶

The possible misuse of commission dollars received additional SEC scrutiny in 1998 during a well-publicized soft dollar "sweep" during which broker dealers were audited for possible abuses.

Again and again, rightly placed concerns have foundered on the inadequacy of audit trails, the unrecorded nature of many soft dollar arrangements and the mutual benefit derived by industry players who work to preserve the opacity of the payment system.^{7 8}

Commissions, Accounting Bills, Phones and Exchange Fees

A major wirehouse-sponsored soft dollar "converter" had bill-paying arrangements with 264 third party "research" providers/vendors in 1988. That same broker converted commission dollars to pay 573 vendors in 1994. **Today, the list has grown to more than 1,200 service suppliers** (exhibit 4).

Accounting firms Ernst & Young and PricewaterhouseCoopers now can be paid with soft dollars.⁹ Telephone companies, including SBC, Pacific Bell and US West

⁶ Oral Testimony of David Silfen, partner, Goldman Sachs and Co., July 12, 1993, House Telecommunications and Finance Subcommittee

⁷ Nearly two-thirds of soft dollar agreements are unwritten and more than one-third of brokers are a party to illegal soft dollar arrangements, Benn Steil, "Can Best Execution be Achieved in the Current Market Structure?" AIMR Conference, December 1, 2000

⁸ A check with our auditor determined that funds do not record income or expense from soft dollar practices because of the difficulty in assigning a value to research services and because of the undocumented nature of most agreements.

⁹ See Appendix A, approved vendor relationships with major wirehouse soft dollar broker.

can be paid with commissions. Professional development programs at the Kellogg School of Management and the Wharton School can be financed with commission streams. Recruiting firm Kforce.com is on the list. So are Compaq, Dell and CompUSA. The Standard Club of Chicago, "a private retreat of luxury and tranquility...home to Chicago's fashionable society and the business elite for over 125 years,"¹⁰ also appears as a destination for some commission dollars.

Does not an investment manager require a phone, a newspaper and a stock quotation service to meet even minimal expectations of the investing public who pay a management fee for that service? Without specific regulatory action from the SEC and Congress that compels better disclosure and assignment of the economic value of this undisclosed income stream, more and more costs of business may soon fit the elusive and ever-expanding definitional framework of "research" under section 28(e).

SEC staff members have explained to me that definitions of best execution and research are so vague as to defy enforcement action. Recent attempts to define best execution "best practices," such as the Association for Investment Management and Research (AIMR) guidelines, have been watered down by qualified language offered by those with compelling commercial self-interests.

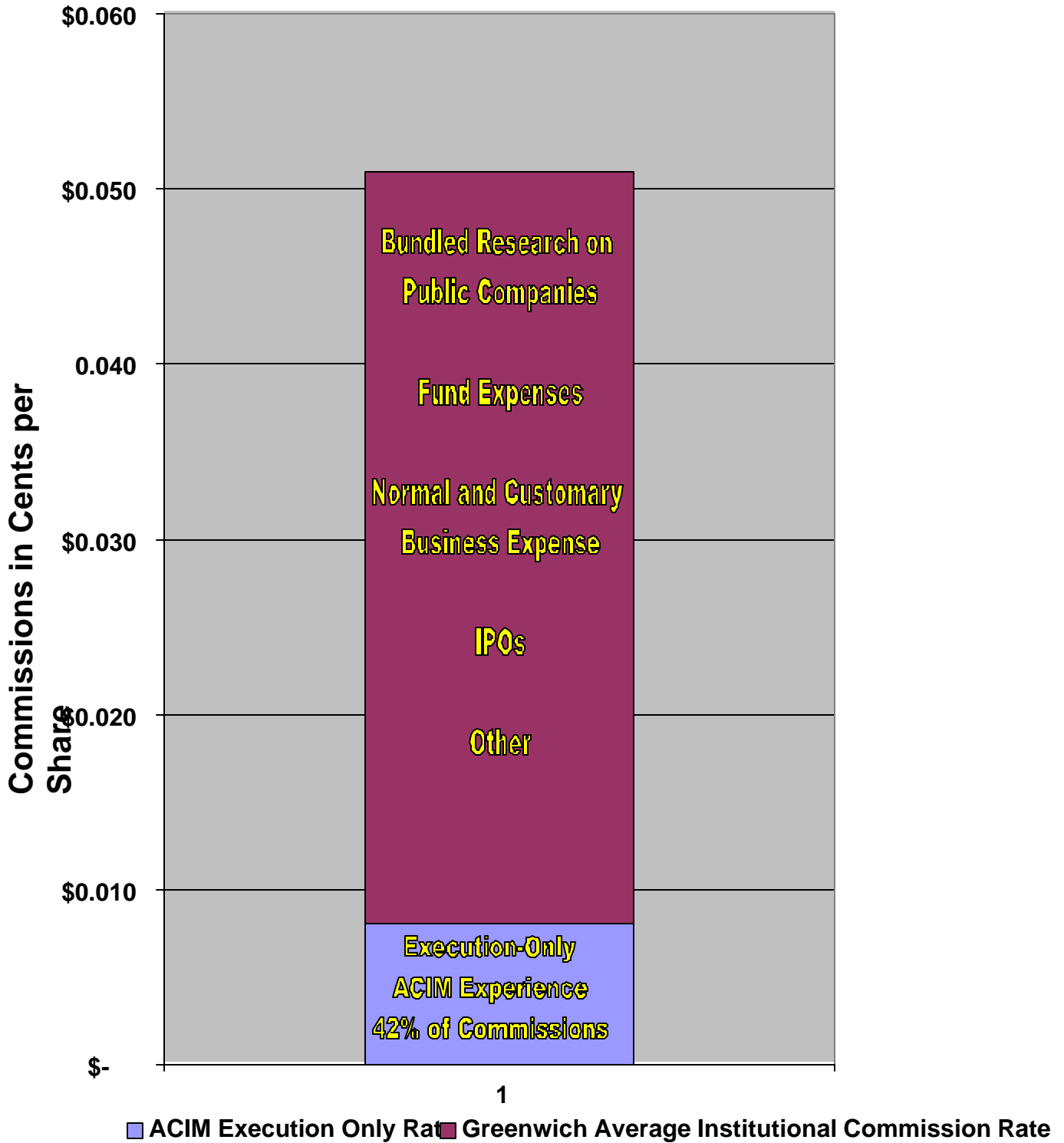
¹⁰ Quote from Standard Club website.

As an investment manager, I can tell you that good thinking by brokerage firm analysts often is invaluable in making wise investment decisions for my investors. As a trader, I can tell you that at times brokers critically augment our execution capabilities by facilitating block trades and by supplementing our internal trading resources during periods of heavy trading activity. The brokerage industry does provide valuable service to mutual fund advisors and other investment managers. However, our industry has failed thus far to adequately measure and report on the cost of these services to investors. The structural profit incentives of current practices will not change without the intervention of Congress to better define and limit the scope of section 28(e).

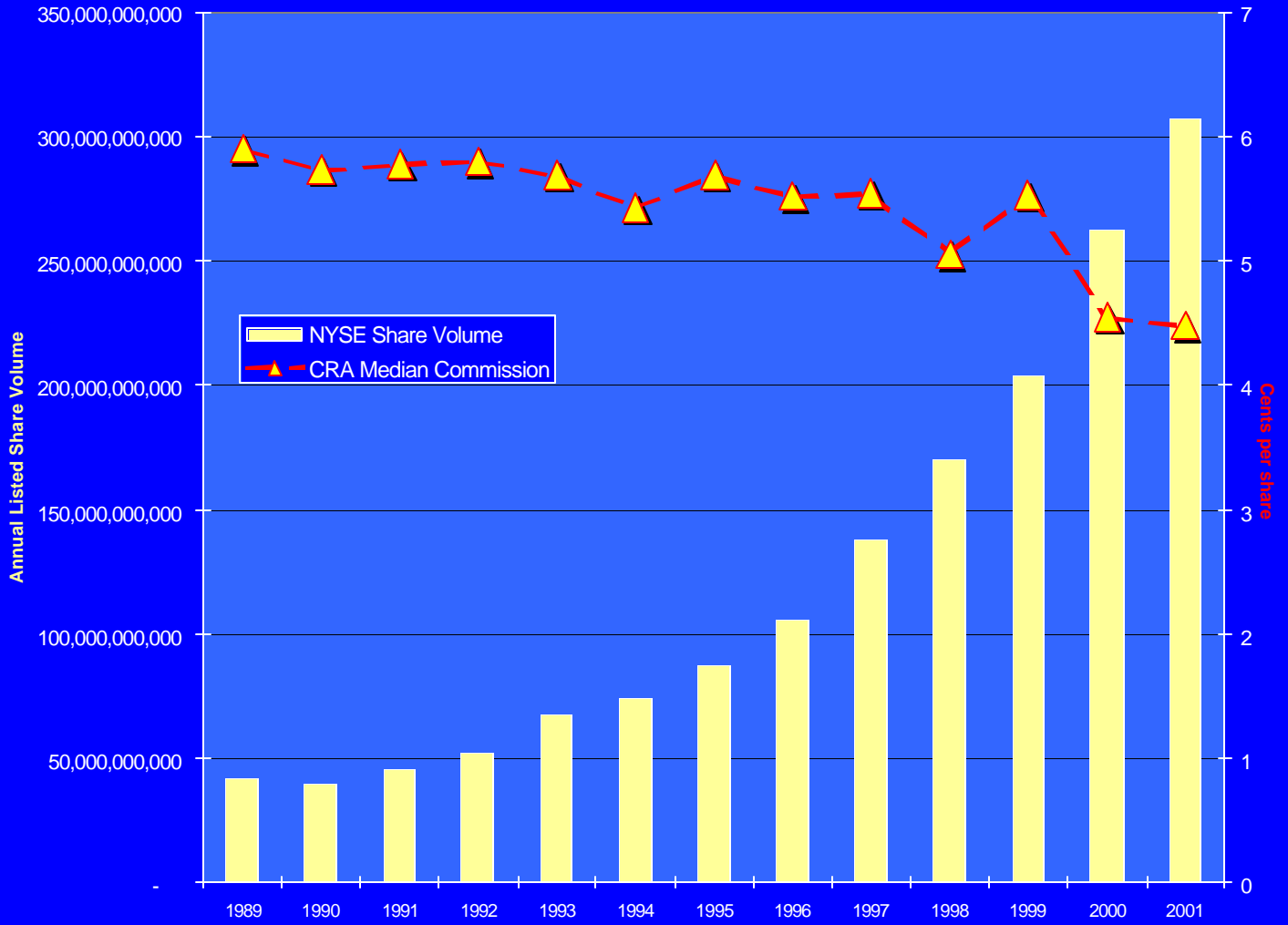
Thank you for the opportunity to share my ideas on behalf of American Century and its investors.

What Does "Paying Up" Mean

Imputed Cost of Research in 2002

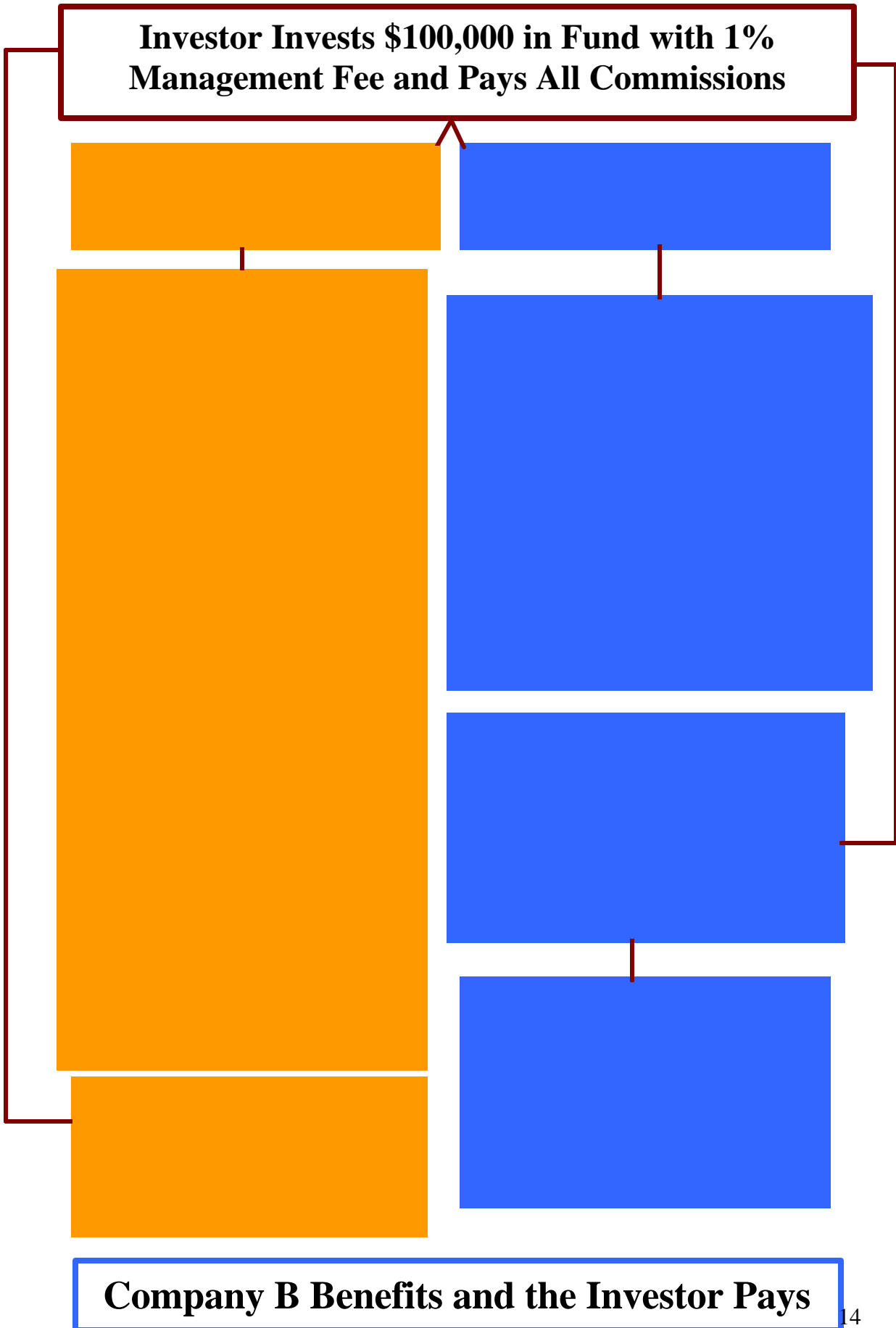


NYSE Listed Share Trading Volume and CRA Industry Median Commissions



Commission chart inclusive of ECN agency fees.

Impact of 28(e) on Management Company Earnings Who Would You Rather Be?



Leading Soft Dollar “Converter” About 1,200 Vendors

Acadia Research Group
Accent Systems, Inc.
A.G. Bisset & Co., Inc.
American Health Consultants
ACNeilsen
Acromedia Systems, Inc.
Active Graphics
ADP Investor Communication Services
Advantage Data Inc
Agra Europe (London) Ltd
Airco Mechanical Inc.
Alan Reynolds Associates
Alliance Capital Management, LP
Alliance-Ibbotson Research Institute
Alliance of Healthcare Advisors
Allied Riser Operations Corporation
Allmerica Financial
Alpha Enterprises International
American Express Financial Advisors
American Skandia Investors Services, Inc.
American Stock Exchange
Ameritech
AMG Data Services
AMR Research
Analytic Systems Corp.
Anari Incorporated
ANB Investment Management
Annuity Price Center
Arbor Trading Group Inc.
Argus Research Corporation
Aristadata, Inc.
Armstrong Teasdale, LLC
APT Partners
Ark Asset Management Co., Inc.
Arrow Group
ASG Companies
Asia Society (The)
Asian Wall Street Journal (The)
Asia Pacific Communications Limited
Aspen Publishers, Inc.
Aspen Research Group, Ltd.
Asset Performance Partners
Asset Strategy Consulting
Associated Investment Services
Astro Office Products, Inc.
Atec Group
A-T Financial Information Inc.
Atlantic Group FPPM, Inc.
Atlanta Journal and Constitution, The
Attronics
Autex Group
Automotive News
Avalon Research
Avenue Technologies

Aviation Week Group
Axiometrics Inc.
B/C Computing, Inc.
Banc of America Securities
Bader Computer
BAMAR Enterprises Inc.
Bank of America
Bankers Trust Company-NY
Bargerhuff & Associates, Inc.
BARRA International
Barron's
Barrow Hanley Mewhinney
Baseline
BB&T Capital Markets
BCA Publications
Becker Vanetten, Inc.
Behavioral Economics, Inc.
Benderly Economic Associates
Berge Consulting Group
Berkeley Program in Finance
Big Dough.com
Billings Research
Biopharma Consulting Group
Bioscience Securities
Birinyi Associates Inc.
BIRR Portfolio Analysis, Inc.
BITS Inc.
Black Box Network Services
Blakeney Management
Blitz Computer
Bloomberg, LP
Bloombury Minerals Economics Ltd.
Blue Chip Growth Letter
Blue Heron Consulting
Bobbi Trading Corporation
Bogdan Computer Services, Inc.
Bond Buyer, The
Bond Investor Newsletter (The)
Bond Market Semiotics
Bonneville Market Information
Book Industry Study Group
Boston Capital Markets Group, Inc.
Boston Company Asset Management, Inc., The
Boston Energy Research
Boston Safe Deposit & Trust Co.
Boyd Watterson Asset Management LLC
Bowne of Chicago, Inc.
Boxalls
BPS Consulting Services
Brandywine Asset Management, Inc.
Breaking Views
Brean Murray & Co., Inc.
Bridge Japan Inc.
Bridgewater Associates
Brinson Partners, Inc.
British American
Brookside Corporation
BSP Solutions
BT North America
Buck Consultants
Bulls Eye Research
Burgiss Group (The)
Business Cycle Perspectives Inc.
Business Intelligence Advisors
Business Research Publications

BuzzCompany.com

C.S. McKee & Co., Inc.
Cabletron Systems
Cable Television Tokyo Ltd
Cableworx
Cadence Capital Management
Cadogan International Conferences Ltd
California Technology Stock Letter
Calamos Asset Management, Inc.
Calab Fund LP
Callan Associates, Inc.
Cambridge Associates Inc.
Cambridge Energy Research Associates
Capital Analysts Network
Capital Hill Research
Capital Insights Group
Capital Management Sciences
Capital Market Publishers India Ltd.
Capital Reflections Inc.
Capital Resource Advisors
Capitol Publications Inc.
Carty Mailloux Consulting, Inc.
Cast Software, Inc.
CCBN.Com (Street Events)
C-Call.Com
CCH Washington Service Bureau Inc.
C.D. Crary & Co
CDrive Corp.
CDW
Center for Management Research, Inc.
Center for Research in Security Prices
Century Securities Associates Inc.
Charter Investment Group
Charter Research Corporation
Chaumont, Inc.
Check Free Corp-Investment
Chemical Institutional Asset Services
CHR Metals Limited
Cimino Associates
Citicorp-North America/Leasing Inc
Clarendon Marketing & Production
Clarsen Investment Research
Clydsedale Bank PLC
CML Market Letter Inc., The
Coach Comp America
Coleman/Bartlett's Washington Focus
Columbine Capital Services
Comerica Bank & Trust
Comline Business Data, Inc.
Commerce Bank of St. Louis
Commercial Estate Secondary Mkt.&Sec.
Commercial Property News
Commercial Real Estate
Commodity Accounting Systems
Commodity Metals Management Company
Commodity Trend Service Charts
Comp USA, Inc.
Compass Bank
Compaq Computer Corp.
Compaq Direct Plus
Complete Communications, Inc.
Comprehensive Computer Center
Compucom
Computer & Application Inc.
Computer Express, Inc.
Computer Merchants LTD
Computer Horizons Corporation

Computerwire, Inc.
Computerized Portfolio Mgmt Services Inc
CommScan, L.L.C.
Comscore Networks
Comtrade
Condor Advisers
Consensus Economics Inc.
Consolidated Natural Gas Company
Container Consulting
Containerisation International
Contravisory Research Corp.
Convergent Media Systems Corp.
Conway Pedersen Economics, Inc.
Corestates Bank
Cornerstone Peripherals Technology
Corporate Access/Condor
Cortex A[[lied Research Inc
Cost Effective Measurement Inc
CotLook Ltd.
Council of the Americas
Covato Research Corporation
Cramer Rosenthal McGlynn, LLC.
Crandall Pierce and Company
Credit Sights
CrossBorder Capital
Crowley Micrographics, Inc.
CSK
CRU International LTD
CTC Illinois Trust Company
CTS Financial Publishing
Customized Data Systems, Inc.
Cutler and Company, Inc.
CWR Computer Consultation

DAC Easy Software, Inc.
Daily Deal, The
Daily Variety
Dallah Media Productions
Dalton, Greiman, Hartman, Maher & Co
Dan Royer & Co.
Daniel Morton & Company, Inc.
Darwin Partners, Inc.
Data Broadcasting Corporation
Data Comm Warehouse
Data Transmission Network Corporation
Datastream International Ltd.
Dataware Solutions
Davis, Mendel & Regenstein, Inc.
Decision Software, Inc.
Dell Direct Sales Corporation
Dell Quotation
Dell'Oro Group
Denver Gold Group
Depository Trust Company, The
DePrince, Race & Zollo
Derivative Solutions
Des Plains Office Equipment Company
DeScenza & Co., Inc.
Detroyat Associates, Inc.
Dial Data
DiBiasio & Edgington, Inc.
Directv
Disclosure Incorporated
Docupro
Dodge & Cox
Dollarlink Software
Dorsey, Wright & Associates, Inc.
Dow Jones Financial Publishing, Co..

Dow Jones Markets, Inc.
 Dowling & Partners Securities, LLC
 DPC Data Inc.
 Duff & Phelps Credit Rating Co.
 Dunedin Fund Managers Ltd
 Dympna Clarke
 Dynamic Traders Group, Inc.

 Eagle Development Group
 Ebsco Subscription Services
 Eclipse Computer Systems, Inc.
 Econoclast, The
 Economatica
 Economic Analysis Associates, Inc.
 Economic Cycle Research Institute, Inc.
 Economics from Washington
 Economist, The
 Edgar Online
 Edward Walter Design
 EEI Efron Enterprises, Inc.
 EFM Technical Research Limited
 Egan-Jones Ratings Company
 EGS Securities
 Electric Power Daily
 Electric Utility Week
 Eliassen Group, Inc.
 Elliott Wave International
 Elkins & McSherry Co. Inc.
 Emap Business Communications
 Emery Consulting Services
 Empire Group LLC
 Energy Argus
 Engineering News-Record (McGraw-Hill Cos.)
 Ennis Knupp & Associates
 Enteract Corp.
 Enterprise Communications
 Entex Information Services, Inc.
 Equant Resources
 Equity Research Associates
 Ernst & Young LLP
 Estima
 Euromonitor International, Inc.
 Eurohedge
 European Investors
 European Private Equity & Venture Capital
 Evans-Novak Political Report
 Exabyte Corporation
 Excalibur Management Corporation
 Excite@Home
 Eze Castle Integration, Inc.

 F-D-C Reports, Inc.
 Fair Disclosure Financial Network
 FAME Information Services
 Farallon Capital Management, LLC
 Farrell Advisory Associates, LLC
 Faxon Company, The
 Federal Filings Inc.
 Federal Reserve Bank of Boston
 FICOMP, Inc.
 Fidelity Management Trust Company
 Financial Control Systems Incorporated
 Financial Information Services
 Financial Planning Resources
 Finucane, J.W. Financial Consulting
 First Data Investor Services Group, Inc.
 First Equity Corporation of Florida
 First Interstate Bank of California

First Pacific Advisors, Inc.
 First Source International Inc.
 First Union
 Fitch Investors Service
 Fleet Bank of MA
 Fleischman Richard & Associates
 FMH Investments, LC
 Forbes
 Ford Investor Services
 Formprint
 Formula Research
 Foundation for Intl Business & Eco. Res.
 Fourteen Research Corporation
 Franklin Research's Insight
 Fraser Management Associates
 Free Market Inc.
 Freedom Capital Management Corporation
 FRI Corporation
 Front Line Systems
 Frontier Analytics, Incorporated
 FTSE International Limited
 Future Source
 Future Data Systems Inc.
 Futures Magazine Group
 Futures Trading Center

 G A T Integrated Financial Services
 G. A. Clarke & Associates, Inc.
 G7 Goup, Inc.
 Gabriel, Roeder, Smith & Company
 Galaxy Consultancy Limited
 Gann, AWD Treasure Discovered
 Gancarz Software Consultants
 GARP Research Company
 Gartner Group
 Garzarelli Outlook, The
 Gateway 2000
 Gateway Companies
 Gateway ShopStop.Com
 GE Capital Information Technology
 GE Information Services Inc.
 Gerson Lehrman Group
 Giga Information Group, Inc.
 Gilder Publishing
 Gilder Technology Report
 Gimme Credit Publications Inc.
 Glenmede Trust Company
 Global Advanced Technology Corp.
 Global Information Resources, Inc.
 Global Investment Research, Inc.
 Global Investor Publishing
 Global Market Consultants, Ltd.
 Global Network (The)
 Global Technology Consulting, Inc.
 Global Technologies, Inc.
 Global Trend Alert
 Gold Stock Analyst
 Golden Star Technology/Micro City
 Goldman Sachs Asset Management
 Gordian Institute
 Gordon, Haskett & Company
 Gorham Advanced Materials Institute
 Grant's
 Green Tree Vendor Services Corp
 Greenhill
 GRI Companies
 Grotevant Walker Research Ptners.
 Group of Thirty

Gylmesi & Wedinger P.C.

H. Buff Herr
H. Clark & Company Limited
HC Istanbul
HSBC Broking (Data Service) Ltd.
Haimovilch Medical Technology Company
Hammer Consulting Group, The
Hanner Consulting Group (The)
Hanson, Perry & Jensen, PA
Harris Corp. Digital Telephone System
Harris Investment Management
Harris Trust and Savings Bank
Harry Hansen Management, Inc.
Helix Investment Partners, LP
Hellenbrand Consulting, LLC
Hewitt Associates
High Frequency Economics, LTD.
HK Ventures
HKC Securities
HLH/Panoramic
Holt Value Associates
Hood Company (The)
Horace W. Brocking Consulting
Howe Barnes Investments
HSBC Bank USA
Hub Data, Inc.
Hueler Analytics
Hughes Design/Communications
Huntington Investment Company

I.D.E.A. Incorporated
I/B/E/S International, Inc.
Ibbotson Associates, Inc.
IBCA Limited
IC Insights, Inc.
ICM Conferences
ICMS International
IDC Portfolio Management Inc.
IDS Advisory Group, Inc.
Imark Communications, Inc.
Imprima Management Services Inc.
IMS America, Ltd.
IMI Systems Inc.
IMS Health, Inc.
Inacom Information Systems
Income Research & Management, Inc.
Independent Investor Digest
Independent Perspectives
Independent Professional Services
Independent Strategy
Indepth Data Inc.
Industrial Contractor, Inc.
Infinity (A Sunguard Company)
Info USA Marketing Inc.
Information Management Network
Information USA Marketing Inc.
Information Resources Inc.
Informix Software, Inc.
Info-Reach, Inc.
Infoshare Communications, Inc.
Infosys Technologies Limited
Infotech
ING Baring Furman Selz, LLC
Ingalls & Snyders LLC
Innotech Solutions, LLC.
Inside Mortgage Finance Publications
Inside Radio

Insight Capital Management, Inc.
Institute for International Economics
Institute for International Research, The
Institute of International Finance
Institute for Private Investors
Institutional Capital
Institutional Investor Services
Institutional Property Consultants, Inc.
Institutional Real Estate, Inc.
Institutional Research Services, Inc.
Institutional Shareholder Services
Institutional View (The)
Insurance Forum (The)
Interactive Data
Intergrated Circuit Engineering Corp.
Inter-Logic Associates, Inc.
International Capital Market Corp.
International Cement Review
International Data Corp.
International Data Corp., Asia/Pacific
International Finance Corporation
International Forecasting
International Fund Administration
International Management Services
International Monetary Fund
Internet Network Technologies
Internet Systems Design Group, Inc.
Intersec Research Corporation
Intersoft Corporation
Interstudy Publications
Intex Solutions, Inc.
Intraspect Software
Investec, Inc.
Investek, Inc.
Investment Advisers, Inc.
Investment Analytics
Investment Company Institute
Investment Counsel Association of America
Investment Data Corporation
Investment Dealers' Digest, Inc.
Investment Research Institute
Investor Economics Inc.
Investors Bank and Trust Company
Investors Business Daily
Invesco, Inc.
InvestWorks
Ista Mielke GMBH
IPC Information Systems, Inc.
IPL Technologies, LTD.
IPO Financial Network
Ira Sohn Investment Res. Conf.
J. Glass & Associates
JG Kilan Company
J.L. Kellogg Graduate School of Management
Jag Notes
Jerome Levy Forecasting Center
JM Cannell, Inc.
JMA Research Institute Inc
JMR/Financial, Inc.
John Wiley & Sons
Johnson Custom Strategies, Inc.
Johnson Rice & Company LLC
Jolson Merchants Partners
Jos Technology Inc.
Joseph DeCosimo and Company
Journal of Finance (The)
Journal Watch

J.P. Morgan Investment Management
JT Sorrells Inc
Jupiter Media Metrix
J.W. Finance Consulting

Kagan World Media
Kaufman Brothers, LP
KEA Capital
Keane Inc
Kforce.com
KMI Corporation
Kenny Information Services
Kenwood Group, Inc.
Kestrel Technologies, L.L.C.
Kilpatrick Stockton LLP
Kinder, Lydenberg & Domini, Inc.
King & Spalding
Kingsley Associates
Kinsley Power Systems
Kirkpatrick and Company
KLD Research & Analytics Inc
KMI Corporation
Knight-Ridder Information, Inc.
Knobias.com
Kobren Insight Management, Inc
Koch Financial Corporation
K.P.A. Advisory Services

LaJolla Economics
Lamers Equity Research
Lande Group/Micro Computer Systems
Lark Research
LaSalle National Bank
Laurence H Meyer & Associates, Ltd
Lavery Consulting Group
Legg Mason Wood Walker, Inc.
Lehrman Bell Mueller Canon, Inc.
Leigh Bureau
Lend Lease Rosen
Leuthold Group, The
Lexis Document Services
Lexis/Nexis
Leylegian Investment Management, Inc.
Liebert Corporation
Lifeline Industries, Inc.
Little Black Box Forecasts
Line Data Services, Inc.
Lincoln Capital Management Company
Lipper & Company. LP
Little Black Box Forecasts
Liscio Report (The)
Lloyd George Investment Management
LMC International, Ltd.
Loan Pricing Corporation
LongView Group (The)

M. Shanken Communications
MacKay-Shields Financial Corporation
Macro Computer Products, Inc.
Macroeconomic Advisers, LLC
Managed Account Reports
Manufacturing & Network Solutions
Market.com, The
Market News Service Incorporated
Market Profile Theorems, Inc.
Market Research Corporation
MarketNet Group
MarketSoft Research

Market Statistics
Market Systems Newsletter
MarketSoft Research
Market Trends Investors
Market Vane Corporation
Marquette Associates, Inc.
Marquette Financial Group
Marsico Capital Management, LLC
Martaus & Associates, Inc.
Martin Currie, Inc.
Marvin Zonis & Associates, Inc.
MBH Commodity Advisors Inc
McAfee Associates, Inc.
McCarthy, Crisanti & Maffei, Inc.
McCartney Construction Company
McClellan Financial Publications, Inc.
McDonald Investments
McDonnell Information Systems Limited
McSherry & Company
MCSI Computer Supplies
Measurisk .com
Mealey's Group, The
MediaOne
Medley Investment Group, LLC (The)
Megent Fis
Mehta Partners
Mellon Bank
Mellon Trust
Merritt Communications
Mesirow Financial
Meta Group Inc
Metal Bulletin Inc.
Metriplex, Inc.
Metropolitan West Asset Management
Metzler Services
MFS Telecom, Inc.
Michigan National Bank
Micro Design Resources
Microage Computer Stores
Microhedge, Inc.
Microland-Macroland "HQ"
MicroMedia Inc
Micron Electronics, Inc.
Micropoint Computers
Mi-Kro Computer World
Midas-Kapiti International
Middle East Economic Survey
Miller Anderson & Sherrerd, LLP
Millennium Investment Corporation
Milliman & Robertson, Inc.
Milken Institute Conference Center
Missing Link, The
Mitchell Hutchins Institutional Investors Inc.
Mitchinson Napier Bedford
ML Consulting Services
ML Trust of America
Mobile Plant
Modern Healthcare (Crain Communications)
Mondiale Partners, Ltd.
MoneyLine Network, Inc.
Money Manager Review
Money Market Directories, Inc.
Monis Software Limited
Montgomery Investment Technology
Montag & Caldwell, Inc.
Moody's Investors Services
Morgan Stanley Capital Intl Research
Morningstar, Inc.

Mosaic Research
MRL Trade Limited
MSNBC Desktop
MST Research, Inc.
Multex Systems, Inc.
Multichannel News
Municipal Emp. Rtmt. Sys. of Michigan
Municipal Market Advisors
Municipal Market Data
Municipal Treasurers' Association
Murex North America, Inc.
Murenove Inc.
Muzea Insider Consulting Services

NAA Foundation
NAIC Securities Valuation Office
Nasdaq Stock Market, Inc., The
N.A.S.I.P
Nat City Investments
Nat Institute of Investments
National Association of Real Estate Trust
National Center for Cont. Education
National City Cleveland/Trust
National Institute of Investment Research
National Mortgage News
National Order Educators
National Planning Corporation
Nationwide Financial
Navellier-MPT Review
Navigant Consulting, Inc.
NBC Levesque International Ltd.
NCM Capital Management Group, Inc.
Nebrask Investment Council
Nelson Industries Profit Sharing
Neo Technologies
Neovest, Inc.
Netteks Technology Consultants
Network Appliance
Network Access Solutions
Neovision Hypersystem
Nevada Institutional Investors
New Economy Watch
New Edge Networks
New Pittsburgh Courier
New York University Stern School of Business
New York Stock Exchange, Inc.
New York Times, The
NewsEdge Corporation
Newsware, Inc.
New Vernon Associates Inc
Nicholas-Applegate Capital Management
Nielsen Media Research
Niemeyer, Korwin-Krystyna
Nikkei Data
Nilson Report, The
Nirvana Systems Inc.
Noah Financial, LLC
North River Ventures
North Shore Printers
Northern Trust Quantitative Advisors
Northfield Information Services Inc.
Novalink Limited
NYU Stern School of Business

Oak Associates, Inc.
Oasis ComputerSolutions
Oasys

Omgeo LLC
One Source Information Services, Inc.
Onsite Access, Inc.
Open Systems Technologies
Optima Investment Research, The
Options Price Reporting Authority
Oracle Corporation
OrbiMed Advisors, LLC
Orderpoint TIS
Orford Capital Management
Orion Research Partners
OTA-Off The Record Research
OTC, Inc.
Outstanding Investor Digest

P. C. Quote, Inc.
Pacific Bell
Pacific Growth Equities
Pacific Pension Institute
Pacific Select Distributors
Paladin Investment Associates
Pan Pacific Software LLC
Patrick Hayden (Consultant)
Patriot-News Co., The
Patterson Capital Corporation
Paul Kagan Associates
Payden & Rygel
PCI (Xylenes & Polyesters) LTD.
PC Magazine
Peachtree Software
Penfold Limited
Pensions 2000
Pennisula H/V Beach EN, The
Penobscot Group Inc., The
Pensions 2000
Pension Benefit Information
Pensions and Investments
Perception International
Performance Services Group
Performance Technologies, Inc.
Peter Cole and Company
Peter Mikolaj & Associates
Petroleum Intelligence Weekly
PharmaBooks Ltd
Philadelphia Newspapers, Inc.
Philadelphia Tribune (The)
Phileo Allied Securities
Philip S.P. Randolph, Inc.
Phillips Global Media
Phillips Office Products, Inc.
PictureTel Japan Co. Ltd
Pillette Investment Management, Inc.
Pittsburgh Post Gazette
Pira Energy Group
Pittsburgh Post Gazette
Plan Sponsor Network, Inc.
Platformmedia LLC
Platt's Oilgram Price Report
Platt's Newsletter/Newswire
Plexus Group
PNC Bank
Polyconomics, Inc.
Pomeroy Computer Resources, Inc.
Portfolio Management Technology
Portfolio Solutions
PREA

Precision Timing
Precursor Group
Premier Solutions
Preservation Research
PricewaterhouseCoopers
Primark Canada, Inc.
Primark Decision Economics, Inc.
Prime, Buchholz & Associates, Inc.
Princeton Economic Institute, Inc.
Princeton Financial Systems
Princeton Retail Analysis
Private Equity Analyst, The
Proequities Inc
Professional Alternative Inc.
Professional Expert Trading Systems
Professional Training Services, Inc.
Protel Communications Ltd.
Provident Investment Counsel
Proxy Monitor, Inc.
Proxy Voter Services
PRS Group (The)
Publishers Service Exchange
Puget Sound Economic Forecaster
Putnam Advisory Company, Inc.
Putnam Investments Inc.
Pzena Investment Management

Q-Tech Communications
QED Information Systems
Quantec Investment Technology
Quantitative Analysis Service, Inc.
Queens City Financial Consultants
Quest
Quick, Moneyline, Telerate Corp.

R & B Financial Solutions
RCG Information Technology Inc.
R.H. Wrightson & Associates Inc
R.W. Mansfield Co., Inc.
Ranking Service, The
Radio Business Report
Rampart Investment Management
Real Estate Alert
Real Estate Transformation Group
Reference, Inc. The
Regulatory Research Associates
Reininga & Company
Reinganum Consulting
Reliable Corp (The)
Renaissance Capital
Renaissance Worldwide IT Consultants
Republic Security Bank
Research Network (The)
Research Works
Research Vision Limited
Resource Advisory, Inc.
Resource Center (The)
Reuters America, Inc.
Reuters India Limited
Reuters LTD (Austria)
Reuters Singapore Pte Ltd.
Richard L. Hanley Associates
Richards & Tierney Inc.
Ried Thunberg & Co Inc.
Righteous Intl. Subscription Services
Risk Conferences and Training Courses
Riskmetrics Group LLC
Rittenhouse Financial Services

Riverplace Consulting Services
Robert F. Fargo & Co., Investment Res.
Rockefeller Treasury Services
Rogers, Casey and Associates
Roxbury Capital
Roxin and Company
Royal Oaks Consultants Group
Royal Institute of International Affairs
Ruarte's Report
Rudd and Wisdom, Inc.
Ryan Labs, Inc.

Salomon Analytics Inc.
Santa Fe Institute
Sayers Consulting Services
Schroeder Advisory Services, Inc.
Schulte Roth & Zabel LLP
Schwab Performance Technologies
Schwab Washington Research Group
Scientific Investing
Seagate Software
Seamans Capital Management
SEC Insight
Sector, Inc.
Sectorbase.com, Inc.
Securities Data Publishing
Securities Industry Automation Corp.
Securities Operations Forum
Securities Research Company
Securities Software & Consulting, Inc.
Segal Company (The)
Segall Bryant & Hamill
Seidel Associates Incorporated
Select Equity Group, Inc.
Semantic Architects
Seneca Capital Management
Sentinel Pension Institute
Seward & Kissell LLP
Shands Jacksonville Medical Center
Shartsis, Friese & Ginsburg, LLP
Short Capital LTD
Siemens Business Communication
Sierra Investment Partners
Sigma Systems, Inc.
Silverback Networks, Inc.
Simplified Computer Services
Simon-Hunt Strategic Services
Sims Moss Kline & Davis LLP
Simsbury Electronics, Inc.
SIT Investment Associates, Inc.
Sitelis Design Studio
Skytel Pagers
Smith's Research & Rating Review
Smithers & Co. Ltd.
Software Spectrum
Solsource Computers, Inc.
Soliton Associates, Inc.
South African Inst. Of Race Relations
Southland Sound Corporation
Sovran Capital Management Corporation
Soyata Computers of Rochester
Spartan Institutional Research, Inc.
Spencer F. England & Co., Inc.
Spencer Fane Britt & Brown LLP
Sprucegrove Investment Management Ltd.
SSI Technologies PTE., LTD.
St. Louis Business Journal
Stafford Publications

Stalla Seminars
Standard Club (The)
Standard Valuations, Inc.
Starmine
Startspot Mediaworks
State Street Bank and Trust
State Street Global Advisors
Statsci
Statsoft
Stax Inc
Stellcom Technologies
Stern Stewart & Company
Stevens Publishing Corp.
Stock Data Corporation
Stock Management, Inc.
Stock Market Geometry
StockVal, Inc.
Stone & McCarthy Research Associates
Strain Consultants Inc.
Stratecon Corporation
Strategic Economic Decisions, Inc.
Strategic Insight
Strategic Investment Solutions
Strategic Morning Line
Street Software Technology, Inc.
Stremkal Inc.
Stroh Corporation
Sturza's Institutional Research
Sugarman and Susskind, P.A.
Sun America Capital Services, Inc.
Sun Microsystems
Superstock Investors
Syscom, Inc.
Symmetria Software LLC
Syntegra
Synergistics Technology Inc.

13D Research
Taj Technologies, Inc.
Taylor Consulting Inc.
Team Systems
Tech Hackers, Inc.
Technology Investing
Technology Solutions International
Telecommunications Reports
Telemet America Inc
Teleport Bermuda Limited
Telerate Systems, Inc.
Telesphere Corporation
Tempus International Ltd.
THL Managers V LLC
Thomson Asia PTE LTD.
Thomson Corporation HK
Thomson Financial Media
Thomson Financial Muni Group
Thomson Financial – Portfolio Solutions
Thomson Financial – Solutions
Thomson Wealth Management
Tiboco Financial Technology
Thomson Asia PTE LTD.
Tillinghast-Towers Perrin
Time Inc. Asia
Time Magazine
TIS Group, Inc.
Tokyo Stock Exchange Computer System
Topline Investment Graphics
Toronto Stock Exchange, The
Torch Capital Corporation

Toyo Keizai, Inc.
Townsend Group, The
Track Data Corp
Trade Management Systems, Inc.
Trade Web
Trade Winds
Trade Wins Publishing
Trading & Investment Programs & Systems
Tradenet Corporation
Tradition Financial Services Inc.
Trans-Lux Corporation
Transmarco Data Systems Pte Ltd.
Trans-National Research Corporation
TRD Consulting, Inc.
Trepp Management Group
Tri-State Envelope Corporation
Trias Capital Management
Trim Tabs Financial Services, Inc
TRS Staffing Solutions, Inc.
True Solutions, Inc.
Tuff Management Co.
Turnaround Letter (The)
T.W. Cooney & Associates
Twin Capital Management, Inc.

U. S. Offshore Funds Directory
U.S. Communication, Inc.
U.S. Micro
UCLA – Anderson Forecast
Unisys Corporation
United Data
United System Solutions
University of Miami Diagnostic Clinic
UNIWEB-NET
US Connect
US West Communications
Utility Pension Fund Study Group
UUNET Technologies, Inc.
Uvest Investment Services

Vanstar
Veneroso Associates
Venture Financial Systems Group, Ltd.
Venture One
Vertex Computer Cables & Products
Vestek Systems
Vickers Stock Research Corp.
W.H. Brown & Co., Inc.

Walker's Manual, LLC
Wall Street Calendar Corporation
Wall Street Journal, The
Wall Street Source, LLC
Wall Street Strategies
Warwick Business School
Washington Research Group
Wedge Capital Management, Inc.
WEFA Group, The
Wellington Management Company
Wells Fargo, Institutional Trust Division
Wharton Real Estate Review
Wharton School Executive Education
WHO Investment Consulting Company
William R. Hough & Co.
Williams Inference Service, The
Williams & Jensen

William Smith Special Opportunities Research
Williamsburg Investment Co.
Windhover Information, Inc.
Winter, Wyman & Company
Wipro Limited
WM Company, The
WM Smith Special Opportunity Research
Woodmentum Technical Research
World Steel Dynamics, Inc.
World Bank, The
World View, Inc.
Wyatt Investment Consulting, Inc.

Yankee Prognostics, Inc.
Yanni-Bilkey Investment Consulting
Yelton Fiscal, Inc.
Yon Drake & Associates

Zacks Investment Research, Inc.
Zephyr Associates, Inc.
ZPR International, Inc.,