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## COMMISSION APPROVED

Comments of the Bureaus of Competition, Consumer Protection and Economics of the Federal Trade Commission\*

on

Proposed Regulations of the U.S. Sec and se Commission Governing Perfe

Advertising by 1 13

December 22, 1986

<sup>\*</sup> These comments represent the views of the Bureaus of Competition. Consumer Protection, and Economics of the Federal Trade Commission and do not necessarily represent the views of the Commission or of any individual Commissioner. The Commission, however, has authorized the submission of these comments.

#### I. INTRODUCTION

The SEC has requested comment on several proposed rules and rule changes governing advertising by mutual funds.<sup>1</sup> The proposals would restrict advertising of performance claims to narrowly prescribed formulas, time periods, and formats.

In the late 1970s and early 1980s, the SEC abandoned many of the long-standing restrictions it had imposed on advertising of performance claims by investment companies. This deregulatory effort was intended to increase investor interest and access to information about no-load funds and reflected the agency's recognition that revising its regulations to keep pace with innovations in financial instruments was extremely difficult. Following these reforms, the market share of no-load funds increased dramatically and many innovative funds were established. Now, however, the SEC is considering advertising regulations even more restrictive than those of the previous decades. Although the proposed restrictions may be justified in some specific applications, we are concerned that they sweep much more broadly than they should. As now formulated, they are likely to eliminate many current nondeceptive truthful performance claims, increase the cost and decrease the effectiveness of remaining performance advertisements. diminish effective consumer access to information about no-load funds with lower sales and distribution costs, and hamper the development of innovative funds.

<sup>&</sup>lt;sup>1</sup> <u>Federal Register</u>, Vol. 51, No. 187 (September 26, 1986), pages 34384-34408. The SEC proposals, which concern advertisements covered by SEC rule 482, originated from ones made earlier by the Investment Company Institute (ICI). The ICI proposals were limited to defining a yield formula for income funds. The SEC proposals extend to several additional issues.

The FTC staff recommends against restricting or limiting nondeceptive truthful performance advertising to specific formulas, time periods or formats (Section II.B.1. below). If the SEC has evidence that consumers would benefit from greater uniformity of performance advertising, the SEC could consider the less restrictive approach of endorsing a particular total return and yield formulas and encouraging their use without prohibiting alternatives (Sections II.B.2. and 3.) If the SEC has evidence that consumers are confused about certain characteristics of mutual funds, the SEC could consider simple triggered disclosure requirements addressing the specific points of confusion (Section II.B.4.).

#### II. FTC STAFF ANALYSIS AND RECOMMENDATIONS

A. General Comments

The FTC staff's major objection is that many of the SEC proposals would restrict advertising of truthful and non-deceptive performance claims. We regularly evaluate restrictions on non-deceptive truthful advertising and mandatory disclosures in carrying out the FTC's consumer protection mission.<sup>2</sup> Our research and investigations provide convincing evidence that

The FTC has actively pursued research, regulations, and cases in this area. The FTC staff's research on advertising restrictions includes:  $W_{\perp}$ Jacobs et al. Improving Consumer Access to Legal Services: The Case for Removing Restriction on Truthful Advertising, Washington, D.C.: Federal Trade Commission, 1984; R. Bond et al., Effects of Restrictions on Advertising and Commercial Practice in the Professions: The Case of Optometry, Washington, D.C.: Federal Trade Commission, 1980; R. Bond et al. "Self Regulation in Optometry: The Impact on Price and Quality," Law and Human Behavior 7:2 (1983), pages 219-234; Drug Product Selection, Washington, D.C.: Federal Trade Commission, 1979; and A. Masson and R. Steiner, Generic Substitution and Prescription Drug Prices: Economic Effects of State Drug Product Substitution Laws, Washington, D.C.: Federal Trade Commission, 1985. Also see A. Maurizi, "The Elfects of Laws Against Price Advertising: the Case of Retail Gasoline," Western Economics Journal, 10 (1972), pages 321-329; A. Maurizi and T. Kelly, Prices and Consumer

most regulations restricting the distribution of non-deceptive truthful information harm consumers (or, in the case of investment products, investors) and should therefore be avoided. Because consumers face different circumstances and have varying preferences, they seek different - types of information. Restrictions on truthful advertising claims increase consumers' costs of locating the most suitable products and the lowest price sellers. As a result, consumers are more likely to make inferior purchase decisions. With less ability to inform consumers, efficient and innovative producers will be less able to attract consumers and hence the variety of products will be reduced.

In addition to our general objections to restrictions on truthful nondeceptive advertising, the SEC proposals appear to be based on what we believe is an incorrect interpretation of the role of advertising in marketing mutual funds. The SEC seems to believe that each advertisement should be viewed as the sole piece of information on which investors might base their investment decisions. In contrast, we believe that advertising often serves primarily to eatch the attention of investors and allows them to narrow their search for further information to a small number of funds that are most apt to be suitable for their needs. The plethora of comparative performance information, including many widely available investment publications (See Appendix A), brokers, toll free information numbers, and the prospectus and other sales literature, all support this latter view of the role of performance

Information: The Benefits of Posting Retail Gasoline Prices, Washington, D.C., American Enterprise Institute, 1978; L. Benham, "The Effect of Advertising on the Price of Eye-Glasses," Journal of Law and Economics, 15:2 (October 1972), pages 337-352; and R. Feldman and J. Begun, "Does Advertising of Price Reduce the Mean and Variance of Prices?," <u>Economic</u> Inquiry, 18 (July 1980), pages 487-492.

advertising. Indeed, the view that investors make decisions based solely on advertisements is completely inconsistent with existing SEC requirements concerning distribution of the detailed prospectus.<sup>3</sup>

#### - B. Specific Suggestions

With the previous observations in mind, the FTC staff has the following specific suggestions about the SEC's proposals.

1. <u>Prohibition Of All But Certain Narrowly Prescribed Performance</u> <u>Claims</u>: The FTC staff's greatest concern is the proposed ban on all performance claims other than narrowly prescribed yield and total return claims (discussed in subsections 2 and 3). Such a ban would eliminate significant amounts of currently available investment information leading to higher investor search costs, poorer investor decisions, reduced product variety, and less effective competition among funds.<sup>4</sup> Equally important, such restrictions likely would make it more difficult both for relatively new funds to expand and for investors to compare the performance of mutual funds with that of other investment options (such as CDs, directly held

<sup>&</sup>lt;sup>3</sup> Certainly the rationale for the SEC requirement that funds distribute a detailed prospectus is undermined if, as the SEC assumes, investors use only advertised information about the fund. Further, if advertisements are the only or primary source of investor information, it is all the more important that the SEC <u>not</u> limit the information that funds are seeking to provide.

The SEC could gather evidence on the degree of investor reliance on advertisements to the exclusion of other sources of information and then search for evidence that this reliance is misplaced. We note that there is some evidence that mutual funds investors on average do about as well as the market. See, for example, H. Shawky, "An Update on Mutual Funds: Better Grades," Journal of Portfolio Management, Winter 1982, pp. 29 - 34.

<sup>&</sup>lt;sup>4</sup> The SEC proposal to require detailed explanations of all performance calculations in the current prospectus could have similar restrictive effects by removing flexibility to advertise alternative performance measures during the life of the prospectus.

common stocks, and real estate). These likely effects are inconsistent with the goals of encouraging innovation and improving investor information about different investment options.

To determine the extent to which the SEC proposals would limit - advertising of fund performance, we reviewed recent performance claims in advertisements in three leading periodicals. Appendix B reveals that many potentially important claims would be banned by the proposed restrictions. Examples include: claims based on performance rankings calculated by independent parties such as Lipper Analytical Services, Money, Wall Street Journal<sup>5</sup>, or Moody's for various periods, total returns over periods longer than five years, simple and compound average annual total returns, graphical presentations of returns, performance comparisons measured against broad market indexes such as the S&P 500 or the rate of inflation, and reports distinguishing capital gains from returns due to reinvestment of dividends.<sup>6</sup> Any of these factors could be critical to a particular investor's search behavior and investment selections.

In addition, the proposed regulations would curtail advertising of potentially useful performance comparisons involving circumstances that occur irregularly, such as how a fund performed when the dollar was last

<sup>&</sup>lt;sup>5</sup> "A Special Report: Financial Planning," <u>Wall Street Journal</u>, Section 4, December 1, 1986, pages 5D to 7D.

<sup>&</sup>lt;sup>6</sup> To the extent that any of these performance characteristics are either required or allowed in the prospectus, it would be illogical and inconsistent to prohibit them in advertisements, assuming they are nondeceptive in the context of each particular advertisement.

The data in the current and past perspectuses are public and in combination with pricing data in the newspapers are sufficient to calculate all of the statistics published by investment services and business publications. There is no issue concerning public availability of data necessary to calculate performance measures.

depreciating against foreign currencies.<sup>7</sup> Investors interested primarily in cash flows could also find advertisements less informative with respect to the performance measures of greatest use to them, such as current yield (dividends and interest income of the fund) or distributions to shareholders.<sup>8</sup>

2. <u>Disclosure of Annual Total Returns for Five Years</u>: The SEC proposes a "triggered" mandatory disclosure of annual total rate of return data for each of the most recent five years, calculated in a prescribed manner<sup>9</sup>, in any advertisements containing any performance claims. In the case of income funds, claims concerning yields (the only other permissible performance claim) would trigger these total return disclosures. In the case of other funds, only the total return claims would be allowed in the first place.<sup>10</sup>

<sup>7</sup> Specifically, the proposed requirement that performance data must be current (the end of the calculation period must be less than 30 days before the publication date) would exclude such comparisons to past periods.

<sup>8</sup> An example is provided by the new corporate cash funds. These funds are of interest primarily to cash managers of small firms who are looking for extremely short term investments of excess cash that will qualify for the corporate tax exemption on earnings from investments in other firms. Preventing corporate cash funds from advertising distributions will eliminate the most relevant item of information for prospective investors in these funds.

<sup>9</sup> Calculation of total return, which includes capital gains, income, and other distributions, is already standardized, and we see no likely source of investor confusion. There seems to be no benefit from formalizing this further with a regulation.

The total return formula proposed by the SEC departs from the standard approach, which allocates load charges across whatever holding period is advertised. The SEC proposal attributes all of the effects of initial load charges to the first year of holding and all redemption charges to the final year of holding and would seriously distort reported returns in these years. See Appendix C.

<sup>10</sup> We infer that if the SEC were to allow additional performance claims (as we suggested above), the SEC might require that all such claims be accompanied by these total return disclosures.

The FTC staff recommends against such mandatory disclosure. Although some investors may benefit from this uniform information. investors may bear costs that on balance exceed these benefits.

For instance, the mandated information may clutter advertisements, particularly those involving broadcast media, making them less effective in conveying information, or it may crowd out other information that is more relevant to investors. The reduced effectiveness or increased costs of advertising performance claims caused by the mandatory disclosure requirements may cause some funds to reduce or discontinue their performance advertising altogether. This result is, in turn, likely to harm consumers because of its effects on search costs, investment decisions, and product variety. A restriction on mutual fund advertising claims would presumably force potential purchasers, at increased costs, to rely more heavily for their initial search on other sources of information, including published listings, investment services, and brokers. This restriction would hit hardest at the no-load and low-load funds that depend on advertising to promote investor interest, and would least affect high-load funds sold by brokers. Thus, investors would likely make greater use of broker services and pay more sales charges than they would if they purchased no-load funds.

Furthermore, we have doubts about the benefits investors would obtain from the proposed disclosure of total returns. Our first concern is that historic total returns for <u>income funds</u> may be a systematically biased indicator of future performance in the present historic context. Total returns on income funds typically are inversely related to interest rates. As a result, total returns for income funds after a period of falling interest

rates, such as the present, are likely to be high. However, interest rates are unlikely to decline ad infinitum, so the future path of interest rates is unlikely to be as steep and subsequently future returns are unlikely to be as high in the future. If so, forcing income funds to disclose five-years of - total returns (if they advertise the current yield) may mislead investor's about the prospects for these income funds in the present historic circumstances. Our second concern is that there are many widely available privately published rankings of all types of funds based on total returns over various periods (see Appendix A) making it questionable that there is an information market failure in this matter. Net benefits from government mandated disclosures of additional information of this type are therefore unlikely.

3. <u>Yield Calculations For Income Funds</u><sup>11</sup>: Although the SEC seeks comments on the possibility of banning yield advertising entirely, the primary yield proposals are to limit advertising of yield claims to a specified formula and to ban entirely yield advertising by funds with less than 95% of the assets devoted to debt obligations.

Yield calculations are a major item of information that investors might want about income funds. Historic yield calculations allow investors to form better hypotheses about future performance either in absolute terms or relative to other investment options. Historic yield calculations are also a good vehicle for drawing investor attention to the characteristics of particular funds and thereby reducing investor search costs.

<sup>&</sup>lt;sup>11</sup> Yield is distinct from total return in that it does not include consideration of capital gains.

Because a ban on historic yield calculations would likely harm investors and make it more difficult for low cost and high performance funds to attract investors, the FTC staff strongly supports the SEC's proposal to continue to permit advertising of historic yield calculations.<sup>12</sup> We believe. however, that the SEC's proposal to ban yield claims for funds that do not have at least 95% of their assets in debt holdings is apt to harm investors and retard the growth of the funds that best match investors' interests. For example, some funds adopt both income and growth goals and invest in both bonds and stocks. Investors might reasonably want to know the vield on the portion of a fund's assets that are invested in bonds, although if a fund chose to advertise yield on just a portion of its assets, the fund should have to disclose what portion had the advertised yield. Investors who are particularly interested in cash distributions might also want to know the yield averaged across a fund's entire portfolio to determine how much yield they sacrifice in order to obtain the growth opportunities provided by the stock portion of the fund's portfolio.<sup>13</sup>

We also oppose regulations that would prohibit mutual funds from using all but one yield formula. Investors are likely to be interested in more than one type of yield calculation. For example, for some purposes investors may be most interested in a yield that includes the effect of amortizing premiums and discounts. For other purposes, they may want a yield figure that excludes the effect of such amortization. Similarly, investors may want yield

<sup>&</sup>lt;sup>12</sup> Section II.1. in the <u>Federal Register</u> notice.

<sup>&</sup>lt;sup>13</sup> Such l'unds are sometimes termed "balanced l'unds." Examples of large balanced l'unds include Investors Mutual and Wellington Fund.

information calculated for various time periods, yields that include or exclude the effects of various sales charges, etc.

Although no truthful nondeceptive yield claims should be prohibited, yield advertising might be more informative for some investors if yields were reported in a uniform manner designed to facilitate comparison of performance claims across funds and with other investments. For this reason, we agree that it might be appropriate for the SEC to encourage use of the specific yield formula that it believes to be the most informative. If investors find this voluntary standard to be helpful, fund managers will have an incentive to use the SEC formula because it will make their advertisements more effective.

If the SEC has evidence that use of the "SEC yield" formula needs to be further encouraged, the SEC could consider a rule under which use of the "SEC yield" would not require further explanation while use of other yield calculations would require an explanation at some appropriate level of conspicuousness. If the SEC has evidence that consumers are still being misled by use of yield formulas such as the commonly used "current yield," the SEC should consider the merits of a triggered disclosure requirement. For example, advertisement of any other yield formulas by an income fund might trigger a requirement to disclose the SEC yield in an equally prominent way. However, the SEC should keep in mind that such a requirement would raise the costs and reduce the amount of advertising of other yield information that would be useful to consumers.

The yield formula specified in the SEC proposals has technical difficulties and could be improved upon. Suggestions for amending the yield formula are contained in Appendix D.

Mandatory Risk Disclosures: The SEC proposes to require 4. mandatory disclosure of risk measures and or risk-adjusted measures of return whenever any performance claims are made. We oppose the compulsory aspect of this proposal. Funds should be free to disclose - nondeceptive truthful historic risk measures, which may be useful to investors. Forcing funds to do so, however, may be counterproductive. First, mandatory risk disclosures might actually have the perverse effect of reducing the amount of performance advertising. Some funds might refrain from advertising any performance measures at all for fear that the complexity of these required disclosures would confuse investors. Second, mandatory disclosures always increase the clutter within advertisements, thereby reducing the effectiveness of all the other information including other mandatory disclosures and information which the fund managers believe to be most useful to investors.<sup>14</sup> Moreover, there is no market failure with respect to general risk information. Several publications and investor services already produce and sell such information, and funds are free to include it in advertisements.<sup>15</sup> There is no justification for government intervention.

<sup>14</sup> See Sections II.B.2. and 3. concerning other proposed mandatory disclosures.

<sup>&</sup>lt;sup>15</sup> Major publications which provide risk measures for their readers are listed in Appendix A. Although many advertisements for bond funds reference bond risk ratings of the issues that they buy, none of the advertisements for other funds referenced specific risk measures such as betas. (Beta is the standard risk measure used in finance texts. Beta is the coefficient on the market index variable in a regression seeking to explain rates of return on an investment over time.) Some advertisements did chart the value of an investment over time in comparison to an index (such as the New York Stock Exchange Composite Index) which would allow a potential investor to see how movements between the fund and a market index have been correlated. Some advertisements also mentioned continuity in positive rates of return over several years.

Finally, given the status of current research, we urge caution even in endorsing a particular risk-adjusted return measure at this time, because of the substantial danger that it may later be found to be biased and or inaccurate.<sup>16</sup>

5. <u>Other Disclosures</u>: The SEC proposals would require a number of triggered disclosures designed to prevent investor misperceptions of the meanings of different performance measures.<sup>17</sup> If the fund had the particular characteristic, it would have to make the disclosure if it advertised performance claims. The proposed disclosures include the following:

a. A disclosure that explains how historic performance measures (which -carry no necessary implication about future performance) differ from "guaranteed" yields such as those arising from debt obligations of the U.S. government or certificates of deposit.

b. A disclosure distinguishing investments in which the value of the principal may vary over time from investments in which the value of the principal is fixed (at least in nominal terms).

<sup>&</sup>lt;sup>16</sup> S. Tinic and R. West, "Risk, Return, and Equilibrium: A Revisit." Journal of Political Economy, 94:1 (February 1986), pages 126-147.

We note in addition that since each investor's incremental risk from investing in a particular issue is a function of his or her other assets, any chosen risk measure is likely to be an inherently somewhat unreliable guide to that investor's risk in buying the security. It is also difficult to determine how a relevant risk measure for bond funds could be calculated from price data. Financial analysts typically rely on third party assessments of bond default risk since prices otherwise are so closely tied to interest rates.

<sup>&</sup>lt;sup>17</sup> The SEC also proposes that all performance data be printed in the same size type which must not be smaller that 10-point type. This requirement is likely to increase clutter and thus make advertisements less effective. A more attractive alternative might be simply to require clearly legible disclosures.

c. A disclosure distinguishing performance measures that include allowance for load charges from measures that do not.

Narrowly focused disclosures of this type can be an appropriate means of addressing consumer misunderstanding. If the SEC finds empirical - evidence that investors do not understand these aspects of mutual funds, and determines that the proposed disclosures are a cost-effective means of correcting the confusion, then mandatory disclosures might be justified.<sup>18</sup>

#### III. SUMMARY

The SEC proposes to impose very restrictive regulations that would limit the advertising of truthful and nondeceptive performance claims by mutual funds. The FTC staff recommends against such restrictions because they would suppress the flow of useful information and therefore harm investors by imposing costs that outweigh any benefits.

The FTC staff believes that one other action may, however, deserve further investigation by the SEC. It is possible that a significant number of consumers would benefit from more widespread use in advertisements of a yield formula that takes account of the amortization of premia and discounts on the securities held by the funds. If so, two approaches might be evaluated. On the one hand, the SEC might designate an appropriate "SEC Yield" formula and encourage its voluntary use. On the other hand, if that method is insufficient, the SEC might take the further step of imposing a

<sup>&</sup>lt;sup>18</sup> Of the proposed "triggered" disclosures, we suggest first investigating the concern about investor misunderstanding of the risks of prepayment and of fluctuations in the value of principal of U.S. guaranteed mortgage backed securities. The SEC might consider requiring that use of the term "guaranteed" in a relevant context in an advertisement be accompanied by a simple disclosure concerning these risks.

trigger a requirement to disclose the SEC yield in an equally prominent way.

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#### Appendix A

### Private Publications Regularly Containing Investment Company Performance Measures

The FTC staff surveyed business and finance publications to establish which regularly include their own or commercially prepared performance measures for investment companies.<sup>19</sup> The list appears below. Those general circulation publications that include risk measures other than simply a time series of returns are shown with a star. In addition, several investment data services produce and sell risk estimates using various techniques, measurement intervals, and time horizons.

Publication Estimated	U.S. Circulation <sup>20</sup>
General Circulation:	
Business Week 76	3,000
Changing Times 1,385	5,000
Money* 86	1,000
Forbes 70	5,000
Dunn's Business Month 28	4,000 _
Barron's 27	5,000
<u>Fortune</u> * 68	1,000
<u>Consumer Reports</u> 3,000	0,000

<sup>19</sup> The ICI provided help in this search.

<sup>20</sup> Source: <u>The Standard Periodical Directory</u>, 9th Edition, 1985-1986. Publishers of <u>Money</u> and <u>Barron's</u> indicated that roughly 40% of their subscribers are mutual funds investors. Publication

Specialized:

Lipper Analytical Services

Weisenberger Investment Companies

Growth Fund Guide

Mutual Fund Chartist

Donoghue's Money Fund Report

Johnson's Investment Company Charts

Money Fund Safety Ratings

Mutual Funds Guide (CCH)

Handbook for No-Load Investors

Moody's Bank and Finance Manual

Gordon Market Timer

Mutual Fund Investing

No-Load Fund Investor

Switch Fund Advisory

Telephone Switch Newsletter

United Mutual Fund Selector

Vickers Facts of the Funds

#### Appendix B

Current Advertising Claims That Would Be Restricted By The Proposed SEC Advertising Regulations

FTC staff conducted a review of investment company The advertisements appearing in the press to determine what types of current advertising claims the proposed SEC regulations would ban.<sup>21</sup> The publications searched in this process were The Wall Street Journal, Money, and Forbes. Each of these publications has wide distribution and the latter two publications carry their own investment company performance measures at regular intervals. This indicates that there is a market for this information and that substantial numbers of potential investors are likely to -have been exposed to the advertisements that the FTC staff reviewed. Table 1 records the observations from the various issues of Money and Forbes. Table 2 records the observations from a collection of all of the actual performance advertisements that appeared in the Wall Street Journal over the period from October 15th to October 31st, 1986, with duplicates removed. These advertisements follow table 2. None of the performance advertisements comply with the SEC proposals in all respects and most of the advertisements contain information that would be banned. The advertisements with forbidden information have a star in the upper right corner of the page.

<sup>21</sup> The staff of the ICI provided assistance in this task.

	<u>Monev</u> 10/86	<u>Monev</u> 8/86	<u>Forbes</u> 10/6/86	<u>Forbes</u> 8-30/82
no. of ads.	42	40	2	3
time period greater than 5 years	13	2	1	3
comparison to broad index	7	1	1	2
performance ranking based on 3rd party calculations	4	4	1	0
graphical presentation	2	0	0	l
maximum and minimum price over the period	2	1	0	0
separate reports of income vs capital gains	2	1	0	1
compound annual return	5	2	l	I
average annual return	3	0	0	0
consistency of gains over time	2	0	. 0	0

#### Table 1 Count of Investment Company Advertisements Making Specific Advertising Claims That Would Be Banned By The SEC Proposed Regulations

# Table 2Count of Investment Company Performance Advertisements MakingSpecific Truthful Advertising Claims<sup>22</sup> That Would Be BannedBy The SEC Proposed RegulationsWall Street Journal, October 15th to October 31st, 1986

-	no. of distinct ads	equity 21	tax-free income 13	income 14	corp. cash l
	time period greater than 5 years	14	0	0	0
	comparison to broad index	6	0	0	0
	performance ranking based on 3rd party calculations	3	6	1223	0
	graphical presentation	3	0	0	0
	maximum and minimum price over the period	0	5	13	0
	separate reports of income vs capital gains	1	0	0	0
	compound annual return	1	0	0	0
	average annual return	3	0	0	0
	consistency of gains over time	3	1	0	0
	other	0	0	0	124

<sup>22</sup> Readily verifiable.

23 Claims about bond "quality."

<sup>24</sup> Statement of short term yield for a non-income fund.

Equity Fund - Average

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THE WALL STREET JOURNAL WEDNESDAY, OCTOBER 22, 1986 59

## For capital growth, transfer your IRA to Bull & Bear.

%

ear

since 1975\*

Capital Growth: it's the name of the game in IRA investment. And it's the *fund* you should consider when transferring your IRA.

Through bull markets, bear markets, three presidents and a recession, the Bull & Bear Capital Growth Fund has averaged exactly a 20% return since 1975. That's 708.8%!

Even though share price and return have varied in the past, as they will in the future, Capital Growth Fund IRA holders have enjoyed this success through Bull & Bear's single-minded adherence to a successful strategy of investment.

There are no commissions or redemption fees, ever. The minimum IRA investment is only \$100. And we'll even do most of the transfer paperwork for you!

### Capital Growth Fund 1-800-847-4200 ext. 518

Please rush me more complete information about the Bull & Bear Capital Growth Fund IRA, including a Prospectus with performance, charges and expenses. I'll read it carefully before Linvest.



THE WALL STREET JOURNAL FRIDAY, OCTOBER 24, 1986

ost people agree with the adage "nothing ventured, nothing gained"

For more information, mail the coupon, speak with your financial advisor, or call

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until it's time to invest their money-when suddenly they develop an aversion to (in New Jersey, 1-800-222-0755). venturing. Such reluctance can denvinvestors the growth oppor- style is moderate, your rewards runities that Oppenheimer's Target Fund has been taking advantage of for over five years.

AVER

Aimed at capital appreciation, the Target Fund has rewarded venturesome investors with an impressive total return of 273% since its inception. Or a 26.0% average annual return.

All it takes is a minimum of \$5.000 and, of course, the understanding that net asset values fluctuate with market conditions and are subject to loss as well as gain.

Oppenheimerat 1-800-222-0700 Because if your investment

may be too.

Oppenheimer Fund Management, Inc. Two Broadway, New York, NY 10004 C Please send me a Target Fund prospectus with more complete information. including all charges and expenses. I will read it carefully before I invest or send money



#### Matiz(0) 11 2/141 김(성용 31

"Assuming a \$10,000 investment at offering price on 1/21/81 heid until 9/30/86 with all dividends and capital gains reinvested. See prospectus (page 2) for information on vearly dividends and capital gains. Past performance is not an indication of future results. © 1986 Oppenheimer Fund Management, Inc.

#### THE WALL STREET JOURNAL FRIDAY. OCTOBER 31, 1986 67

RETURN



AVERAGE ANNUAL

hile it's inevitable that the stock market will continue to go up and down, it's not inevitable that your blood pressure



which over the last ten years. despite all the fluctuations in the equity market and interest rates, has provided investors the not-so-conservative average annual return of 15.4%

This has been accomplished by investing in high-dividendpaving stocks, mostly blue-chip, and in bonds.

Thus investors have enioved impressive growth in the Equity Income Fund-a growth augmented by dividend income.

And while the Fund's share value will fluctuate due to market conditions and is subject to loss as well as gain, diversification within the Fund helps to reduce risk. For informa-

tion on this fund, please mail the coupon, speak with your Consider the Oppenheimer financial advisor, or call us at Oppenheimer, 1-800-222-0700 A conservative stock fund 1 (in New Jersey, 1-800-222-0755).

> Now you can take advantage of the market without the market taking advantage of vou.

Oppenheimer Fund Management inc This Brondway New York, New York 1.

E Pleise send mean Equity Income Frind prospectus with more complete information including ill charges and expenses 1 av 1 m d it carefully before i invest or send money

Name		
Address		
City		Ed
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"Assuming an investment at offering price on 9/30.76 held until 9/30/80 with dividends and capital gains reinvested. See prospectus (P-3) for information on yearly dividends and capital gains. Past performance is not an indication of future results. © 1986 Oppenheimer Fund Management, Inc.

The New Manhattan	Fund
OBJECTIVE: Maximum Appreciation	NO LOAD No sales or
Neuberger & Berman Management (Since 3/1/79)	redemption charge MANHATTAN FUND
RESULTS: Average Annual Percent Increase: 22.2%* Total Appreciation For Over 7 <sup>1</sup> / <sub>2</sub> Years: 357%* FROM MARCH 1: 1979 to SEPTEMBER 30, 1986. Assumes the reinvestment of all dividends	
Please send me a tree prospectus and financial report showing Manhattan Funds portfolio and performance history year by year 1 will read it carefully before i invest. Send no money Name	Neuberger Berman Service Center PO Box 4299 Boston Mass 02211
Culy State Zio	Call toll free day or night: 1-800-922-3700

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Equity Funds - Cummulative

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#### 58 THE WALL STREET JOURNAL THURSDAY, OCTOBER 30, 1986



Benefit from international expertise=call 1-800-638-5660

The Fund has gained 2013 trom indeption 5, 9, 60 to 9, 30, 86, and 75% from 9/30/85 to 9, 30, 86. Figures indiude changes in principal value 14, 14 dividends and capital gains distributions — see bage 9 of the Statement of Additional Information. Market conditions fluctuated and past penditmy: 14 Indicative of future results. T. Rowe Price investment Services, incl. Distributor





New York, NY 1001-

Dept 8F62AL



# Eree TRAMA UPDATE Impressive returns for /RAS!



ON TO WART

If you're disappointed with your IRA results. consider transferring to Fidelity. Choose among a wide variety of Funds – including Fidelity Equity-Income Fund. Compare Equity-Income's impressive record – up 545% over the past 10 years.<sup>1</sup> And while past performance is no guarantee of future results. Equity-Income has the potential for substantial growth and a record of above average dividends. \*

Plus when you choose the Fidelity IRA you'll also enjoy: 24 hour toll-free service. • Convenient telephone exchanges. • Fidelity's expert management. • It's easy to transfer your IRA to Fidelity. Don't delay!

Total returns for the S&P 500 and Equity-Income for the ten years ended 9/30/86 include changes in share price and the reinvestment of all dridends and capital gains distributions. The total return for Equity-Income also includes the effect of the fund's 2% sales charge, updating the prospectus. Stock market conditions were generally up but fluctuated widely over the periods shown S&P 500 is a registered trademark of Standard & Poor's Corporation. Fidelity Equity-Income Fund IRA. For more complete information including management lees, expenses and Equity-Income s 2% sales charge, call or write for a free prospectus. Read it carefully before you invest or send money. Fidelity Distributors Corporation: General Distribution Agent, P.O. Box 660603, Dallas, TX 75266. Same Address City Siate Zip Check here for free Rollover fact kit [ (EQUR) Check here for free Keogh fact kit [ (EQUK) Call toll-free 24 hours. 1-800-544 -0000 INVEST MENI In Massachusens call collect 61-523-1919 WSJE/PURI/102486



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### 58 THE WALL STREET JOURNAL TUESDAY. OCTOBER 21, 1986



# NEW INTERNATIONAL CHOCES Introducing Fidelity Europe and Pacific Basin Funds!

Now the company known for its experience in international investing brings you two exciting new overseas funds! These Fidelity funds let aggressive investors *focus* their search for growth on specific regions of the world. Of course, regional tunds can be volatile and foreign markets can expenence wide fluctuations – in both currencies and prices of securities. But if you're willing to accept greater risk for the potential of higher returns – consider these two new funds!

New! Fidelity Pacific Basin Fund, Pacific Basin's managers aggressively seek growth in Japan, as well as Hong Kong, India, Koren, Singapore, other Far East nations and Australia. The Pacific Basin can be an evoluted region for international investing!

**New!** Fidelity Europe Fund. Tap the potential of growing economies in France, Italy, Luxembourg, Netherlands, Spain, Switzerland, the U.K. and other countries in Western Europe, where neurity a quarter of the world's investments are located (There is a 2% sales charge and 1% degree forder upaons for the Pacific Basin and Europe bonds.) Or consider Fidelity Overseas Fund. This diversided fund is one of the nation's top performing international funds."

The chart shows the fund's impressive record – up 117.6% for the pist year! Of course, past performance is no guaruntee of future results, but many investors look to Fideliay for ex-

s. but

Compute the Results!

penenced international investment management.

### Plus these Fidelity henefits

Fidelity makes it easy to invest overseas You can start with just \$2,500 (\$500 for IRAS). And you also enior • Exchange among more than 50 funds • 24 hour toll-free service. • Fidelity's professional international management and investment research. (All today!





#### The T. Rowe Price High Yield Fund

In times like these, when yields on most income-oriented investments are falling, where do you look for higher current income? The T. Rowe Price High Yield Fund capitalizes on some of the best yields available by investing in a diversified portfolio of long-term, medium to lower quality bonds.

#### Aggressively managed for high current income

In pursuit of high current income, T. Rowe Price bond specialists actively manage the Fund, and diversity it over a broad range of securities. Although vield and share price will vary, this approach should help reduce the greater risks associated with these types of securities. In the 12 months ending 10/ 15/86, the high price was \$11.26, and the low was \$10.38.

#### Benefit from tax-deferred compounding for your IRA

The High Yield Fund is particularly appropriate for IRAs, where the high level of income compounds taxdeferred, helping your money grow faster.

You'll also enjoy free checkwriting for \$500 or more. Plus, with a toll-free call, you can purchase, redeem or exchange among our family of funds at the then current net asset value. The minimum investment is \$1,000 (\$500 for IRAs), with no sales charges.

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For information, call weekdays 8:30 am to 8:00 pm EDT: 1-800-638-5660.



Mail to: T. Rowe Price, 100 East Prart St., Baltimore, MD 21202 Please send me a free information kit and prospectus, with more complete information, including management tees and other charges and expenses. I will read them carefully before I invest or send money. Also send a free information kit for:  $\Box$  IRA  $\Box$  Keogh

Name

Address

City

Zip

\*Average annualized yield for the seven days ending 10/15/86, based on an average price per shillre of \$10.92. Average maturity during this period was 11.5 years: 7. Rowe Price investment Services, inc., Distributor

State





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**1-800-DIAL-VKM FE** 

+ XEROX Financial Services Company

### Van Kampen Merritt

High Yield Fund

The Van Kampen Merritt High Yield Fund offers a high current distribution rate, monthly income, affordability and easy access to your investment.

The Fund invests primarily in medium or lower grade corporate securities. Credit analysis and research is provided to the Fund advisor by McCarthy Crisanti and Maffei. Inc., a Securities and Exchange Commission-designated "nationally recognized statistical rating organization".

Both the current distribution rate and the net asset value will fluctuate as market conditions change. \$14.11 and \$14.12 were the net asset values on 7/29/86 and 10/15/86, respectively.

Call Toll Free and we'll rush a prospectus which contains more complete information, including charges and expenses. Read it carefully before you invest or send money. (Georgia residents call 1-800-633-2252).

\*Current distribution rate is determined by annualizing the monthly distribution paid per share for the one month period ending October 15, 1986 and dividing the result by the ending maximum public offering price for the same period.



### 58 THE WALL STREET JOURNAL FRIDAY. OCTOBER 31. 1986



#### Appendix C

### The SEC Proposed Total Shareholder Return Formula

The SEC proposed total shareholder return formula is: Total Shareholder Return = [ending value - amount invested] / amount invested. According to the SEC proposals, advertisers using this formula would deduct all initial load charges from the first year's return and all redemption charges from the last year's return.

The FTC staff's objection to the total shareholder return formula concerns the timing of the deduction for sales charges. The SEC proposal attributes the whole sales and/or redemption charge to the first and/or last period that is being reported. This may seriously distort the reported pattern of returns over time.

The simplest approach that would avoid the extreme distortions of the current proposal would be to amortize the load charges equally over the reporting horizon. However, because any reporting period is inevitably arbitrary, it seems likely that consumers would generally be interested in a statement concerning the method of calculation.

### Appendix D

The SEC Proposed Yield Formula For Income Funds

The SEC proposes to define the yield from investment in an income fund as: Yield =  $[[(a-b)/c] \times d]/e$ . "a" represents dividends and interest earned during the period. "b" represents expenses accrued for the period (net of reimbursements). "c" represents average daily number of shares outstanding during the period. "d" is the inverse of the fraction of the year represented by the measurement period. "e" represents the maximum offering price per share on the last day of the period.<sup>25</sup> The yield calculation is also to be adjusted to reflect amortization of discounts below or premiums above redemption value that were paid in acquiring debt securities.

If the SEC should decide to designate a particular yield formula for use in advertising claims, the FTC staff recommends changes in amortization and in compounding of the yield.

<u>Amortization</u>: Although we agree that many investors would benefit from use a yield measure that includes amortization of bond premiums and discounts (what is known in financial markets as a "yield to maturity"), the

<sup>&</sup>lt;sup>25</sup> Several alternative price figures are possible. The elements of choice include the time period (for example, the end of the period, the beginning of the period, or a combination during the period), the offer price or the net asset value, and the maximum or some type of average price. None of these is necessarily right or wrong. Using the end of the period price mixes current price with historic income. If the current price is used, the income should be the expected income from holding the current portfolio over the next measurement period. This, however, raises a separate issue since the portfolio composition may be changed so that the projected income is not realized. The most consistent approach would be to use the beginning of the period price. The quandary of several truthful price definitions underlines the arbitrariness of picking a standard and the potential importance of permitting the use of the alternative measures if fund managers believe that they are pertinent to particular investors.

amortization approach proposed by the SEC is not appropriate. The amortization should be based on the difference between the current market price (not the original acquisition cost) and the redemption value at maturity (or call) of a security.<sup>26</sup>

<u>Compounding</u>: Limiting the yield measure to an uncompounded rate is too restrictive. It would reduce the flow of useful information to investors. Investors are likely to be familiar with and accustomed to interpreting both simple and compound yields because of the extensive use of these measures by banks and similar financial institutions, mutual funds at present, and for credit under the Truth In Lending Act which permits use of both compound and simple rates of return. Allowing advertising of both forms of yield should facilitate comparisons between income funds and other income producing investments, and between income funds and costs of borrowing for investment purposes.

<sup>&</sup>lt;sup>26</sup> The FTC staff recommends that the amortization process be applied to all debt obligations including those of tax-exempt entities.



Equity Funds - Year-By-Year

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WE DOUBT WE'LL EVER BE #1. Because our shareholders want consistent performance without volability and rack.	*
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Corporate Cash Fund

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GEICO's no-load Adjustable Rate Preferred Fund yields tax-advantaged dividends up to 93.1% free of federal income taxes.

The measure of a successful corporate cash management program is not what you earn, but what you keep – after taxes.

With GEICO Adjustable Rate Preferred Fund, you keep more, because the Fund's dividends qualify for the 85% dividendsreceived deduction. The Fund offers corporate treasurers a prudent, efficient means to earn attractive rates and keep 93.1% of earnings – after taxes.

A corporation which otherwise would pay the maximum 46% rate will pay only 6.9% tax on the Fund's dividends.

Dividends on the underlying securities are adjusted quarterly aligning yields with current markets to minimize share price

fluctuations. Portfolio diversification results in still further stability.

Fund earns dividends daily. Monthly distributions to your account may be paid directly in cash or reinvested in additional shares

Shares may be redeemed a serr then current net asset value by telephone for next business day federal funds wire. Or by check.

No sales charge for purchases, reinvestments or redemptions.

For more complete information, including management fees and expenses, call for a free prospection Please readit carefully before you muest or sena concy.



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GEICO Investment Services Company GEICO Plaza, Washington, DC 20076

### Tax-Free Income Funds

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Average annualized lie o for the seven bays anding 10/10/86, based on an average orice per share of \$11.74. Average maturity during this period was 24.8 years. Income may be subject to state and local taxes. T Rowe Price Investment Services, inc., Distributor



### The T. Rowe Price Tax-Free Funds

Now, taxpavers in a wide range of brackets can benefit from investments paying dividends that are 100% exempt from Federal taxes.\* As the chart shows, even investors in the 28% bracket can enjoy attractive equivalent taxable yields from our family of municipal bond funds. All four of our tax-free funds have a \$1,000 minimum investment. Plus, each offers free checkwriting and no sales charges.

The Tax-Exempt Money Fund invests in short-term municipal securities. It offers maximum principal stability, plus tax-free money market yields. Although yield and price can vary, this Fund has always maintained a constant \$1.00 per share price.

The Tax-Free Short-Intermediate Fund offers higher yields than the average tax-free money market fund, with price stability greater than funds investing in longer term municipal securities. Yield and price will vary. For the 12-month period ending 10/22/86, the high price was \$5.26, and the low was \$5.08.

The Tax-Free Income Fund is for investors who can accept the wider price fluctuations of longer term municipal bonds in pursuit of an even higher level of tax-exempt income. Yield and price will vary. For the 12-month period ending 10/22/86, the high price was \$10.02, and the low was \$8.65.

The Tax-Free High Yield Fund seeks the highest yields over the long term by investing in medium-to-lower quality securities. Income and price volatility should be the greatest of all our tax-free funds. For the 12-month period ending 10/22/86, the high price was \$11.78, and the low was \$10.15.

FUND	VIELD	EQUIVALENT TAXABLE YIELD		
		28%	TAX BRACKETS	50%
TAX-EXEMPT MONEY FUND	3.73%'	5.18%	5.57%	7.46%
TAX_FREE SHORT- INTERMEDIATE PUND	5.64%2	7.83%	8.42%	11.28%
TAX-FREE INCOME FUND	6.80% <sup>3</sup>	9.44%	10.15%	13.60%
TAX-FREE HIGH YIELD FUND	7.36 <del>%*</del>	10.22%	10.99%	14.72%

Call weekdays 8:30 am to 8:00 pm, Sundays 10 am to 4 pm EST: 1-800-638-5660.



Mail to: T. Rowe Price, 100 E. Pratt St., Baltimore, MD 21202

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Address			
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Income may be subject to state and local taxes ... Average annualized yield for the 7-day period ending 10/22/86. Average maturity was 102 dails 2. Average annualized yield for the 7 days ending 10/22/86 based on an average price per share of \$5.26. Average maturity during this period was 3.8 years. 3. Average annualized yield for the 7 days ending 10/22/86, based on an average price per share of \$9.85. Average maturity during this period was 24.1 years. 4. Average annualized yield for the 7 days ending 10/22/86, based on an average price per share of \$9.85. Average maturity during this period was 24.1 years. 4. Average annualized yield for the 7 days ending 10/22/86, based on an average price per share of \$11.75. Average maturity during this period was 24.8 years. 7. Rowe Price investment Services, Inc., Distributor.



A XEROX Financial Services Company

## Van Kampen Merritt Tax Free High Income Fund $7.91^{\circ} = 10.99^{\circ}$

If you're in the 28% bracket, which is expected to be the maximum bracket effective 1/1/88, you would have to earn 10.99% on a taxable investment to equal this tax-exempt yield.

The Van Kampen Merritt Tax Free High Income Fund earns monthly income exempt from federal income taxes. You always have easy access to your money. Open your account for as little as \$1,500.

Both the current return and the net asset value will fluctuate as market conditions change. \$14.15 and \$16.50 were the net asset values on 10/15/85 and 10/15/86.

Call Toll Free and we'll rush a prospectus which includes more complete information about charges and expenses. Read it carefully before you invest or send money. (Georgia residents call 1-800-633-2252).

\*Current yield is determined by annualizing the monthly distributions paid per share for the 1 month ending October 15, 1986 and dividing the result by the average maximum public offering price for the same period. A portion of the income may be subject to state and local taxes. Effective 1, 1, 87, the maximum tax bracket is expected to be 38,5%, which would mean you would have to earn 12,86% on a taxable investment to equal this taxexempt yield.

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■ High tax-free yields with reduced risk. Scudder Tax Free Target Fund lets you tailor a mix of capital protection and tax-free income that's right for you. The Fund's four portfolios offer longterm investors a degree of capital protection not available from funds without specific maturities. (The Fund's yield and share price will fluctuate. 10/24/85 and 10/24/86 share

Fund's yield and share price will fluctuate. 10/24/85 and 10/24/86 share prices were \$10.58 and \$11.00.) Today's attractive tax-free environment. Scudder can help you take advantage of attractive

Thanks to tax reform. The new law makes Scudder's municipal bond funds more attractive than ever.

And no load makes effective yields even higher. You pay no loads, no fees, no redemption or 12b-1 charges which reduce your investment return. You get added benefits including low \$1000 minimum and free exchange among 15 funds.

Call or write today. We'll send you more complete information on the Scudder Tax Free Target Fund.

opportunities available right now in the municipal bond market.

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Contact Scuader Fund Distributors, Inc. for a prospectus containing more complete information including management fees and expenses. Read it carefully before you invest or send money. \*5.9% is the 1993. Portfolio s net annualized vield for the 7 days ending 10/24/86. Income may be subject to state and local taxes and a small portion possibly to federal taxes.



Vanguard Municipal Bond Fund: High-Yield Portfolio

## IT'S TOUGH TO GET 15.54%... UNLESS YOU'RE EARNING 7.77% TAX-FREE.\*

You know 15% yields on quality taxable bond investments are simply not available today. So Vanguard's high tax-free yields could mean more money in your pocket, depending on your tax bracket. To find out how a tax-free investment can offer you more money than a taxable one, send for Vanguard's Tax-Free Income Fund Kit.

The Kit will heip you compare tax-free and taxable yields so you can decide which is better for you. It will explain how you can take advantage of the high tax-free yields currently available from municipal bonds with Vanguard Municipal Bond Fund's six Portfolios. Plus, municipal bonds offer you the relative safety that comes with the backing of local governments.

Like all bond funds, the yield and share price will move up and down as interest rates fluctuate. For example, the High-Yield Portfolio's share price on 9/30/85 was \$9.38, and on 9/30/86 was \$10.40.

- Vanguard Municipal Bond Fund offers you:
- Unlimited free checkwriting for \$250 or more.
- Toil-free phone exchange at the then-current net asset value with some 40 Vanguard Portfolios.
- Low \$3.000 initial investment, commission-free.

\*777% was the average annualized yield for the High-Yield Portfolio for the 30-day period ended 9/30/86; the average maturity was 21.4 years. For someone in the 50% pracket, the taxable equivalent yield is 15.54%, in the 28% bracket, it is an attractive 10.79%. Income is 100% free from Federal income tax but may be subject to state and local taxes.

### Call 1-800-662-SHIP 24 Hours, 7 Days

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### The T. Rowe Price Tax-Free Funds

Now, taxpayers in a wide range of brackets can benefit from investments paying dividends that are 100% exempt from Federal taxes.\* As the chart shows, even investors in the 28% bracket can enjoy attractive equivalent taxable yields from our family of municipal bond funds. All four of our tax-free funds have a \$1,000 minimum investment. Plus, each offers free check-writing and no sales charges.

The Tax-Exempt Money Fund invests in short-term municipal securities. It offers maximum principal stability, plus tax-free money market yields. Although yield and price can vary, this Fund has always maintained a constant \$1.00 per share price.

The Tax-Free Short-Intermediate Fund offers higher yields than the average tax-free money market fund, with price stability greater than funds investing in longer term municipal securities. Yield and price will vary. For the 12-month period ending 10/15/86, the high price was \$5.26, and the low was \$5.06.

The Tax-Free Income Fund is for investors who can accept the wider price fluctuations of longer term municipal bonds in pursuit of an even higher level of tax-exempt income. Yield and price will vary. For the 12-month period ending 10/15/86, the high price was \$10.02, and the low was \$8.61.

The Tax-Free High Yield Fund seeks the highest yields over the long term by investing in medium-to-lower quality securities. Income and price volatility should be the greatest of all our tax-free funds. For the 12-month period ending 10/15/86, the high price was \$11.78, and the low was \$10.08.

Call weekdays 8:30 am to 8:00 pm. Sundays 10 am to 4 pm EDT: 1-800-638-5660.

FJNO	CURRENT		EQUIVALENT TAXABLE YIEL		
		28%	TAX BRACKETS	50%	
TAX-EXEMPT MONEY FUND	3.85%'		5.75%		1000
TAX-FREE SHORT- INTERMEDIATE FUND	5.67%2	7.88%	8.46%	11.34%	
TAX-FREE INCOME FUND	6.73% <sup>3</sup>	9.35%	10.04%	13.46%	111-12
TAX-FREE HIGH YIELD PUND	7.34%*	10.19%	10.96%	14.68%	



Mail to: T. Rowe Price, 100 E. Pratt St. Baltimore, MD 21202

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## Tax-free funds call 1:800 638-5660

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### 58 THE WALL STREET JOURNAL THURSDAY. OCTOBER 16. 1986



Income may be subject to state and local taxes. 1. Average annualized yield for the 7-day benod ending 10/13/86. Average maturity was 109 days. 2. Average annualized yield for the 7-days ending 10/13/86, based on an average price per share of \$5.25. Average maturity during this benod was 4.0 years. 3. Average annualized yield for the 7-days ending 10/13/86, based on an average price per share of \$5.25. Average maturity during this benod was 25.7 years. 4. Average annualized yield for the 7-days ending 10/13/86, based on an average price per share of \$9.85. Average maturity during this benod was 25.7 years. 4. Average annualized yield for the 7-days ending 10/13/86, based on an average price per share of \$9.85. Average maturity during this benod was 25.7 years. 4. Average annualized yield for the 7-days ending 10/13/86, based on an average price per share of \$1.72. Average maturity during this benod was 25.1 years. 1. Rowe Price investment Services, Inc., Distribution



\*Current yield is determined by annualizing the monthly distributions paid per share for the 1 month ending September 15, 1986 and dividing the result by the average maximum public offering price for the same period. A portion of the income may be subject to state and local taxes. Effective 11.87, the maximum tax bracket is expected to be 38.5%, which would mean you would have to earn 12.91% on a taxable investment to equal this taxexempt yield.



### 1. High current yield.

Scudder Managed Municipal Bonds is currently paying 7.1% tax-free! If you're in one of today's top tax brackets you would need *over* 13% from a taxable investment to equal Scudder's tax-free yield. (The Fund's yield and share price will fluctuate. For example. on 10/9/85 and 10/9/86 share prices were S8.11 and S9.03.)

## 2. Today's attractive tax-free environment.

Current returns from highquality municipal bonds are very attractive when compared to the returns from comparable taxable securities. Scudder can help you take advantage of this opportunity right now.

**3. High quality.** As of 10/9/86 the Fund's entire portfolio falls within the top three quality ratings -72% are AA or better.<sup>2</sup>

4. Scudder's professional management expertise. Scudder is among America's



most experienced investment companies. We introduced America's first no-load mutual fund in 1928. We were one of the first with an international stock fund. And we're a leader in investing for tax-free yields. For over 66 years we've put service and performance first.

## 5. Scudder's investment flexibility, convenience

**and value.** Scudder Managed Municipal Bonds is part of the Scudder Family of Funds. Invest and you're free to move among 15 no-load mutual funds that offer growth, income and stability, as well as tax-free returns. You never pay a transfer charge and you can move your investments with a quick and easy toll-free call.

## 6. No-loads, no-fees, no-surprises. At

Scudder you won't pay extra fees for tax-free yields. The Scudder Family of Funds is completely noload. There's *never* a sales charge, 12b-1 charge, or unexpected "back-end" fee later. Nothing but tax-free returns right from the start.

### **Call now for free facts.**

Today's tax-conscious investor can benefit from current opportunities in the municipal bond market. Call now — toll-free for a free fact kit about how to invest in Scudder Managed Municipal Bonds. You can start with just \$1000. And add to your investment in any amount. Two more good reasons why so many investors call for Scudder Managed Municipal Bonds.

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Boston, MA 02110

outset Source Fund Distributors. Inc. for a prospectors containing nore-complete information including management less and expenses. Read a carchia effore you investor source in some money 1, 7, 1, 1, is the hund sine commanzed yield for the 7 days ending 10/9786 with an average portfolio maturity of approximation 2 ears. Some income muscle subject to state and local taxes and a small portion possibly to federal taxes. 2. It is required that the Fund's investments be at leas 0. A red or better results and results are results and results and results are results are results are results are Taxable Income Funds

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## PuEyour money# where the high yields are: 11.72%

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### The T. Rowe Price High Yield Fund

Distributor

This Fund invests in long-term, medium-to-lower quality bonds. Aggressive management helps to provide high current income and to reduce risk. Yield and share price will vary. The price on 10/8/85 was \$10.43, and on 10/8/86 it was \$10.92. Minimum investment \$1,000 (\$500 for IRAs). No sales charges. For information, call weekdays 8:30 am to 8:00 pm EDT: 1-800-638-5660.

	T.Rowe Price
	T. Rowe Price, 100 E. Pratt St., Baltumore, MD 21202 Please send me a prospectus with more complete utionmation, including management rees and other charges and expenses. I will read it carefully before Linvest or send money
	Address
"Average annualized yield for the seven days e	vields:call 1-800-638-5660



\*

### 1011311(1)1(215 111 where the high yields are 211 The T. Rowe Price High Yield Fund This Fund invests in long-term, medium-to-lower quality bonds. Aggressive management helps to provide high current income and to reduce nsk. Yield and share price will vary. The price on 10/22.85 was \$10.39, and on 10/22.86 it was \$10.95. Minimum investment \$1,000 (\$500 for IRAs). No sales charges. For information, call weekdays 8:30 am to 8:00 pm EST: 1-800-638-5660. owettice Invest With Confidence T. Rowe Price, 100 E. Pratt St., Baltimore, MD 21202 Please send me a prospectus with more complete information, including management tees and other charges and expenses. I will read it carefully before I invest or send money Same Address Cinv Get higher current yields: call 1-800-638-5660

Average annualized yield for the seven days ending 10.22.36, based on an average price per share of \$10.93. Average maturity during this period was 11.1 years. T. Rowe Price Investment Services. Inc., Distributor



Americans who want more out of their investments demand high vields and high quality. Many turn to Ginnie Maes. Fannie Maes and Freddie Macs - the mortgage-backed securities in which Scudder Government Mortgage Securities Fund primarily invests. Investors are earning 8.4%\* from the Fund right now.

High quality with high vield. No doubt you're familiar with the high quality of U.S. Government mortgage-backed securities. But have you looked at their high yields compared to other high-quality investments?

Compare with Treasuries. U.S. Government mortgage-backed securities offer higher income than you can normally expect from Treasuries of comparable maturity.

Compare with longterm bonds. Ginnie Maes even offer yields comparable to investment grade bonds.

### SCUDDER GOVERNMENT MORTGAGE SECURITIES FUND

175 Federal Street, Dept. 270, Boston, MA 02110

### When you compare:

It's easy to see why many Americans choose the high vields and the high quality of



Ginnie Mae funds like Scudder Government Mortgage Securities Fund. Especially when you consider these additional Scudder benefits:

No sales charges. Unlike many Ginnie Mae funds, this Fund has no sales charges or 12b-1 fees. 100% of your money works for you 100% of the time.

Free exchange. You can move your investment among Scudder's 15 funds with an easy toll-free call.

### Experienced manage-

ment. Scudder is America's oldest no-load mutual fund manager. We offered one of America's first international funds and have been providing investment counsel since 1919.

### Expert service.

Scudder professionals are ready to serve you whenever you have a question. need more information or want to make a transaction.

Easy to start. You can invest in Scudder Government Mortgage Securities Fund with just \$1000. And add to your investment at any time. To get started, call or write for a free fact kit. It explains more about the Fund's fluctuating vields and share prices (for example, 10/16/85 and 10/16/86 share prices were \$14.91 and \$15.35). Your kit also includes everything you'll need to get started.

Contact Scudder Fund Distributors. Inc. for a prospectus containing more complete information including management fees and expenses. Read it carefully before you invest or send money. \*8.4% is the Fund's net annualized yield for the 7 days ending 10/16/86. The value of your investment will fluctuate. If interest rates fall, share price will rise. If interest rates rise, share price will fall.



### For today's environment

Many investors are shifting to income producing strategies. Why? There are many reasons, including today's low levels of money market rates.

By contrast, Scudder Income Fund seeks to provide regular quarterly dividends by investing in income-producing securities such as long-term bonds and dividend-paying common stocks.

Scudder income performance — 9.51% current yield The Fund is currently producing income at an impressive annual rate of 9.51%.\* Of course, like most income oriented investments, this Fund's yield along with its

share price will fluctuate. (10/17/85 and 10/17/86 share prices were \$12.34 and \$13.25.)

- Scudder income stability since 1928 In addition to Scudder Income Fund's attractive recent performance, the Fund has paid uninterrupted quarterly dividends for over 58 years. But even as America's oldest no-load mutual fund, its past results can't guarantee future performance.
- And no load can mean even higher returns You pay no loads, no fees, no redemption or 12b-1 charges no extra costs to reduce your investment return.

And you gain added benefits from the following:

- low \$1000 minimum initial investment
- family of 15 no-load funds
- free exchange among funds
- regular statements with combined reports for investors in more than one fund
- quarterly shareholder newsietter

Join the well-informed Call or write today for more information about the Scudder Income Fund and how to make the income strategy work for you.

SCUDDER INCOME FUND 175 Federal Street, Dept. 620, Boston, MA 02110

Contact Soudder Fund Distributors. Inc. for a prospectus containing more complete information including management lees and expenses. Real before you invest or send money (19-51)" is Income Fund's dividend for the last twelve months divided by its share price on 10/17-56.

# sales charges! America's High Yields from Scudder's Ginnie Mae Fund

Looking for the high yields and high quality of Ginnie Maes, Fannie Maes, and Freddie Macs? Consider Scudder Government Mortgage Securities Fund. *Right now*, the Fund's investors are earning 8.4%.\*

High quality. High yields. Compare the high quality yields of U.S. Government mortgagebacked securities in this Fund to other high-quality investments.

**Compare with Treasuries.** Mortgage-backed securities offer higher income than normally expected from Treasuries of comparable maturity.

**Compare with long-term bonds.** Ginnie Maes even offer yields comparable to investment grade bonds.

When you compare: It's easy to see why many Americans



choose the high yields and the high quality of Ginnie Mae funds like Scudder Government Mortgage Securities Fund. Especially when you consider these additional Scudder benefits:

**No sales charges.** Unlike many Ginnie Mae funds, this Fund has no sales charges or 12b-1 fees.

Free exchange. You can move your investment among Scudder's 15 funds with an easy toil-free call.

### Experienced manage-

**ment.** Scudder is America's oldest no-load mutual fund manager. We offered one of America's first international funds and have been providing investment counse since 1919.

**Expert service.** Soudder professionals are ready to serve you whenever you have a question need more information or want to make a transaction.

**Basy to start.** You can invest with just \$1000 (\$240 for IRAs) If get started, call or write for a free fact kit. It explains more about the Fund's fluctuating yields and share prices. (For example, 10/24 85 an 10/24/86 share prices were \$14.9 and \$15.38). Your kit also includes everything you'll need to get started.

SCUDDER GOVERNMENT MORTGAGE SECURITIES FUND 175 Federal Street, Dept. 124

Boston, MA 12110



Contact Scudder Fund Distributors, Inc. for a prospectus containing more complete information including management fees and expenses. Read, totalbefore you invest or send money, \*8.4% is the Fund's net annualized yield for the 7 days ending 10/24/86. The value of your investment will ductuate to the rates fail, share price will rise. If interest rates rise, share price will fail.

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### The T. Rowe Price High Yield Fund

In times like these, when yields on most income-oriented investments are failing, where do you look for higher current income? The T. Rowe Price High Yield Fund capitalizes on some of the best yields available by investing in a diversified portfolio of long-term, medium to lower quality bonds.

#### Aggressively managed for high current income

In pursuit of high current income. T. Rowe Price bond specialists actively manage the Fund, and diversity it over a broad range of securities. Although yield and share price will vary, this approach should help reduce the greater risks associated with these types of securities. In the 12 months ending 10, 17/86, the high price was 511.26, and the low was 510.38.

#### Benefit from tax-deferred compounding for your IRA

The High Yield Fund is particularly appropriate for IRAs, where the high level of income compounds taxdeferred, helping your money grow faster.

You'll also enjoy free checkwriting for 5300 or more. Plus, with a toll-free call, you can purchase, redeem or exchange among our family of funds at the then current net asset value. The minimum investment is 51,000 (S300 for IRAs), with no sales charges.

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For information, call weekdays 8:30 am to 8:00 pm EDT: 1-800-638-5660.

Zip



Mail to: T. Rowe Price, 100 East Prart St., Baltimore, MD 21202 Please send me a free information kit and prospectus, with more complete information including management tees and other charges and expenses. I will read them carefully before I invest or send money. Also send a free information kit for: TIRA T Keogh

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"Average annual zed y erd for the seven its Vending 1017 B6, based on an laverage price der share prist0 92, Average maturity during this bericd was 1113 years if Powe Price investment services ind i Distributor

