

Summary Table

Rule	Nature of Provision	Current Rule	Proposed Rule
Rule 13d-1(a)	Deadline for filing initial Schedule 13D	10 calendar days after acquiring beneficial ownership of more than 5% of shares	5 calendar days after acquiring beneficial ownership of more than 5% of shares
Rule 13d-1(b)	Deadline for filing initial Schedule 13G for Qualified Institutional Investor	45 calendar days after year-end on which beneficial ownership exceeded 5% of shares	5 business days after month-end on which beneficial ownership exceeded 5% of shares
Rule 13d-1(c)	Deadline for filing initial Schedule 13G for Passive Investor	10 calendar days after acquiring beneficial ownership of more than 5%	5 calendar days after acquiring beneficial ownership of more than 5%
Rule 13d-1(d)	Deadline for filing initial Schedule 13G for Exempt Investor	45 calendar days after year-end on which beneficial ownership exceeded 5% of shares	5 business days after month-end on which beneficial ownership exceeded 5% of shares
Rule 13d-1(e)	Deadline for filing a Schedule 13D when an investor initially filed a Schedule 13G but is no longer eligible (i.e., it shifted from passive to control purpose)	10 calendar days after change of purpose	5 calendar days after change of purpose
Rule 13d-1(f)	Deadline for filing a Schedule 13D when an investor initially filed a Schedule 13G but acquired over 20% of the shares outstanding	10 calendar days after change of purpose	5 calendar days after change of purpose
Rule 13d-1(g)	Deadline for filing a Schedule 13G under Rule 13d-1(c) when a Qualified Institutional Investor ceases to act in the ordinary course	10 calendar days after change of purpose	5 calendar days after change of purpose
Rule 13d-2(a)	Deadline for filing amendment to Schedule 13D when there has been a material change	Promptly	1 business day
Rule 13d-2(b)	Deadline for filing amendment to Schedule 13G (other than for crossing 10% threshold)	45 calendar days after end of calendar year if there has been <i>any change</i> from prior report	5 business days after there has been a <i>material change</i> specifically including any material increase or decrease in the shares owned
Rule 13d-2(c)	Deadline for Qualified Institutional Investor to file amendment when ownership first exceeds 10% (and changes \pm 5%)	10 calendar days	5 calendar days
Rule 13d-2(d)	Deadline for Passive Investor to file amendment when ownership first exceeds 10% (and changes \pm 5%)	10 calendar days	1 business day