

## Annex A

The following table comparing the new filing deadlines for Schedule 13Ds and Schedule 13Gs to the deadlines under the prior rules was provided by the SEC in the Adopting Release:

Issue	Current Schedule 13D	New Schedule 13D	Current Schedule 13G	New Schedule 13G
Initial Filing Deadline	Within 10 days after acquiring beneficial ownership of more than 5% or losing eligibility to file on Schedule 13G. Rules 13d-1(a), (e), (f) and (g).	Within five business days after acquiring beneficial ownership of more than 5% or losing eligibility to file on Schedule 13G. Rules 13d-1(a), (e), (f) and (g).	QIIs & Exempt Investors: 45 days after calendar year end in which beneficial ownership exceeds 5%. Rules 13d-1(b) and (d). QIIs: 10 days after month end in which beneficial ownership exceeds 10%. Rule 13d-1(b). Passive Investors: Within 10 days after acquiring beneficial ownership of more than 5%. Rule 13d-1(c).	<u>QIIs &amp; Exempt</u> <u>Investors</u> : 45 days after calendar quarter end in which beneficial ownership exceeds 5%. Rules 13d-1(b) and (d). <u>QIIs</u> : Five business days after month end in which beneficial ownership exceeds 10%. Rule 13d-1(b). <u>Passive Investors</u> : Within five business days after acquiring beneficial ownership of more than 5%. Rule 13d-1(c).
Amendment Triggering Event	Material change in the facts set forth in the previous Schedule 13D. Rule 13d-2(a).	Same as current Schedule 13D: Material change in the facts set forth in the previous Schedule 13D. Rule 13d-2(a).	All Schedule 13G <u>Filers</u> : Any change in the information previously reported on Schedule 13G. Rule 13d-2(b). <u>QIIs &amp; Passive</u> <u>Investors</u> : Upon exceeding 10% beneficial ownership or a 5% increase or decrease in beneficial ownership. Rules 13d-2(c) and (d).	All Schedule 13G <u>Filers</u> : Material change in the information previously reported on Schedule 13G. Rule 13d-2(b). <u>QIIs &amp; Passive</u> <u>Investors</u> : Same as current Schedule 13G: Upon exceeding 10% beneficial ownership or a 5% increase or decrease in beneficial ownership. Rules 13d-2(c) and (d).





Issue	Current Schedule 13D	New Schedule 13D	Current Schedule 13G	New Schedule 13G
Amendment Filing Deadline	Promptly after the triggering event. Rule 13d-2(a).	Within two business days after the triggering event. Rule 13d-2(a).	All Schedule 13G Filers: 45 days after calendar year end in which any change occurred. Rule 13d-2(b).	All Schedule 13G Filers: 45 days after calendar quarter end in which a material change occurred. Rule 13d-2(b).
			<u>QIIs</u> : 10 days after month end in which beneficial ownership exceeded 10% or there was, as of the month end, a 5% increase or decrease in beneficial ownership. Rule 13d-2(c). <u>Passive Investors</u> : Promptly after exceeding 10% beneficial ownership or a 5% increase or decrease in beneficial ownership. Rule 13d-2(d).	<u>QIIs</u> : Five business days after month end in which beneficial ownership exceeds 10% or a 5% increase or decrease in beneficial ownership. Rule 13d-2(c). <u>Passive Investors</u> : Two business days after exceeding 10% beneficial ownership or a 5% increase or decrease in beneficial ownership. Rule 13d-2(d).
Filing "Cut-Off" Time	5:30 p.m. eastern time. Rule 13(a)(2) of Regulation S-T.	10 p.m. eastern time. Rule 13(a)(4) of Regulation S-T.	All Schedule 13G Filers: 5:30 p.m. eastern time. Rule 13(a)(2) of Regulation S-T.	<u>All Schedule 13G</u> <u>Filers</u> : 10 p.m. eastern time. Rule 13(a)(4) of Regulation S-T.