## New Regulation means more Disclosure to Participants

The Department of Labor (DOL) introduced new regulations under section 404a-5 of ERISA. The intent of the regulation is to ensure participants have the information they need to make informed decisions about their investment accounts. The DOL's goal is to provide a more consistent way for participants to compare investments and is part of the DOL's ongoing push for fee transparency.

The goal of the DAP is to meet its fiduciary responsibilities in a way that is helpful to our participants. The first step will be taken with the initial/annual disclosure mailing. You will be receiving the disclosure booklet like the one pictured here containing detailed plan, investment and expense-related information. It is important for you to know that you will still receive all of the plan communications that you are accustomed to. In fact, much of the content of this booklet will overlap with what the DAP has been disclosing since its inception.

The second step involves providing more detailed fee disclosure every quarter to your plan account statement. And last, the new regulation requires notification of any changes to plan-related information such as investment options, plan restrictions, or administrative or individual fees which is a procedure that has already been in place at the Directed Account Plan.

This week the DOL announced that it may push back its April 1 st deadline that $401(\mathrm{k})$ providers were given to comply with the new rules about disclosure. Therefore, the exact date of this mailing will be announced in the April Heads Up newsletter. Please don't hesitate to call the DAP Service Center at 1-877-489-2327 or the Plan Office at 314-739-7373 with any questions you may have concerning this new regulation.


## Summary of what you should expect to receive

## Initial/annual disclosure booklet

The initial booklet is anticipated to be delivered sometime in the second quarter and once every twelve months therafter to all participants or those that are eligible. The primary delivery method will be email and the backup delivery method by mail. Please make sure your delivery preferences and email address is up to date at NetBenefits (www.401k.com) under your profile section.

## Quarterly disclosure

Every quarter, anitcipated to start in the second quarter, your statement will include the required details on fee deductions.

## Change Notices

If there is a change to plan-related information such as investment options, plan restrictions, or administrative or individual fees, participants must be notified no less than 30 but no more than 90 days.

## Manager Changes in the Value Stock Option

The JP Morgan Large Cap Value Fund was replaced with the JP Morgan Equity Income Fund (ticker - OIERX) on 12/22/11 in the Value Stock Option. In comparing the two funds, JP Morgan Equity Income Fund correlates better with the other funds in the option. It's performance and yield have historically slightly exceeded that of JP Morgan Large Cap Value. The CGM Focus Fund will be replaced with the Sequoia Fund (SEQUX) this month. This new fund is a better fit in the option and should provide improved performance. The new target allocation of the Value Stock Option is $20 \%$ BlackRock Value Index, 20\% Neuberger Berman Partners, $20 \%$ T. Rowe Price Value, 15\% JP Morgan Equity Income, $15 \%$ Goldman Sachs Mid Cap Value Instl. and 10\% Sequoia.

## Reviewing the DAP Investment Options

THE MODEL PORTFOLIOS - The model portfolios have been created for the participant who does not want to determine his or her own account asset allocation. The DAP Board of Directors has provided an appropriate asset allocation of the DAP investment options based on varying degrees of risk. Rebalancings occur periodically to maintain the target allocations for the options and models.

## Retirement Model Portfolio

This model is designed for the retiree or participant who desires current income and preservation of purchasing power and to a lesser degree, to lessen currency risk. The target allocation is $80 \%$ in the Stable Value Option, as an inflation hedge, $10 \%$ in the Equity Index Option, $5 \%$ in the Value Stock Option.and 5\% in the International Stock Option to help guard against currency risk.



Growth of \$10,000


Performance


Moderate Model Portfolio
This model is designed for the majority of the participants to provide a balanced long-term asset allocation. The objective of this portfolio is capital growth and income. The target allocation is $35 \%$ in the Stable Value Option, $15 \%$ in the Value Stock Option, $15 \%$ in The Equity Index Option, $15 \%$ in the Growth Stock Option, $10 \%$ in the International Stock Option and $10 \%$ in the Diversified Small Co. Stock Option.

## Conservative Model Portfolio

This model is designed for the retiree or participant who desires income and capital preservations. The target allocation is $60 \%$ in the Stable Value Option as an inflation hedge, $20 \%$ in the Value Stock Option and $20 \%$ in the Equity Index Option.

## Aggressive Model Portfolio <br> Aggres

This model is suitable for younger participants and those who are willing to accept more risk and higher volatility in their investments. The objective of this portfolio is capital accumulation. The target allocation is $20 \%$ in the Stable Value Option, $15 \%$ in the Value Stock Option, $15 \%$ in The Equity Index Option, $15 \%$ in the Growth Stock Option, $15 \%$ in the International Stock Option and $20 \%$ in the Diversified Small Co. Stock Option.

Performance


Growth of \$10,000
Performance

THE INVESTMENT OPTIONS - The DAP Board of Directors applies their investment expertise and careful analysis to select a diversified group of managers that fit the objective for each of the following investment options.

## Stable Value Option

This option is designed to provide investors with a return comparable to that of high quality bonds with less volatility. It invests in a combination of traditional investment contracts, security-backed investment contracts, actively managed bonds, CDs and cash. The benchmark is the Lehman Brothers 1-3 Year Govt./Treasury Index.


This option is designed to provide long-term growth of capital and may include a range of value investment managers. These value managers look for large or mid-cap stocks that are undervalued in the marketplace in relation to factors such as the company's assets, sales, earnings, book value, growth potential, cash flow, or in relation to securities of other companies in the same industry. The benchmark is the Russell 1000 Value Index.



## Equity Index Option

This option is designed to provide a return similar to the Russell 3000 Index. The target allocation is $100 \%$ in the BlackRock U.S. Equity Index. The investment manager attempts to replicate the investment results of the target index by holding all, or in the case of a very broad index, a representaive sample of the index. The benchmark for this option is the Russell 3000 Index.

Growth of \$10,000


Performance


## Growth Stock Option

This option is designed to provide capital appreciation and may include a range of investment managers who invest in the stock of companies that produce high earnings or have the potential to generate earnings growth in the future. The benchmark for this option is the Russell 1000 Growth Index.

Performance



## International Stock Option

## Growth of \$10,000

Performance
This option is designed to provide long-term growth of capital through a diversified portfolio of world securities. Investment is in common stocks of foreign and some U.S. companies. Funds in this category involve great risk and the risk of currency fluctuation. The benchmark for this option is the MSCI EAFE Net Dividend Index.



## Diversified Small Co. Stock Option

This option is designed to provide capital appreciation and contains portfolios that typically include growth and value stocks of small to medium companies. Funds in this category tend to be more volatile than other equity investments. The benchmark for this option is the Russell 2000 Total Index.

Performance


## 2011 Directed Account Plan Expense Overview

The information below is based on un-audited actual expense numbers in addition to estimates of investment manager fees for 2011. The basis points listed below are not charged directly to you but taken as an adjustment to the daily NAV of each DAP Option.

| Average Plan Assets in 2011 | $\$ 767,939,103$ |
| :--- | ---: |
| Total Operating Expenses |  |
| (Recordkeeping, Trustee, Administration, Personnel, Communication) | $\mathbf{\$ 8 4 9 , 0 8 4}$ |
| Operating Expenses as a percent of assets | $\mathbf{1 1}$ |
| Approximate Investment Manager Fees * | $\mathbf{3 7}$ |
| Other Mutual Fund Expenses ** | $\mathbf{5}$ |
| Total DAP Fees and Expenses as a percent of assets - | $\mathbf{5 3}$ basis points |
| * mutual fund investment management fee average <br> ** includes mutual fund transaction fees, 12b-1 fees, <br> administrative fees, and all other asset-based costs incurred by the funds. Does not include transaction costs of <br> participant activity, which is reflected in each BlackRock NAV, lowering BlackRock fund performance. <br> Basis Point - one basis point is equal to 1/100th of one percent. |  |

## 2011 Directed Account Plan Expense Ratios

|  | Option *** (Basis Points) | Morningstar Average (Basis Points) |
| :--- | :---: | :---: |
| Stable Value Option | 33 | $\mathrm{n} / \mathrm{a}$ |
| Value Stock Option | 92 | 90 Large Value |
|  |  | 103 Mid Value |
| Equity Index Option | 18 | $\mathrm{n} / \mathrm{a}$ |
| Growth Stock Option | 89 | 99 Large Growth |
|  |  | 115 Mid Growth |
| International Stock Option | 118 | 110 |
| Div. Small Co. Stock Option | 98 | 104 |
| Retirement Model | 38 | $64^{\wedge}$ |
| Conservative Model | 42 | $63^{*}$ |
| Moderate Model | 63 | $64^{*}$ |
| Aggressive Model | 74 | $95^{*}$ |

[^0]
## Summary of 2011 Manager Changes

| New Funds Added | Option | Date |
| :--- | :--- | ---: |
| Lockwell Small Cap Value | Div. Sm. Co. Stock Option | $1 / 2 / 2011$ |
| TCW International Small Cap | International Stock Option | $3 / 21 / 2011$ |
| Black Rock Instl. Money Market | Stable Value Option | $6 / 30 / 2011$ |
| J.P. Morgan Equity Income | Value Stock Option | $12 / 20 / 2011$ |
| Funds Terminated | Option | Date |
| Oppenheimer International Small Co. | International Stock Option | $3 / 10 / 2011$ |
| Dreyfus Cash Management | Stable Value Option | $6 / 30 / 2011$ |
| JP Morgan Large Cap Value | Value Stock Option | $12 / 20 / 2011$ |

Past performance is no guarantee of future results.
Asset allocation and diversification do not ensure a profit or guarantee against loss.
Investment decisions should be based on an individual's own goals, time horizon, and tolerance for risk. Investing involves risk, including risk of loss. Generally, among asset classes, stocks are more volatile than bonds or short-term instruments.
Foreign investments involve greater risk and may offer greater potential returns than U.S. investments. This risk includes political and economic uncertainties of foreign countries, as well as the risk of currency fluctuation.

Fund Component Weighting
This table represents component weightings for individual investment funds as of December 31, 2011.


## Stable Value Fund


f Funds

Invesco Interest Income Wellington Core Bond

## Value Stock Fund

25.7

BlackRockValue Index Neuberger Berman Partners T. Rowe Price Value JP Morgan Equity Income Goldman Sachs Mid Cap Value Instl. CGM Focus
Equity Index Fund
16.2

BlackRock US Equity Index
Growth Stock Fund BlackRock Growth Index
Marsico Focus
Wellington Mid Cap Opportunities
Turner Mid Cap Growth
T. Rowe Price Growth Stock

Primecap Odyssey Growth
BlackRock EAFE Index
14.6

Templeton Instl. Foreign Equity
Thornburg International Value
Marsico International Opportunities
Am Century International Discovery
Am Century International Growth
Dimensional Emerging Markets Value
Royce Global Value
TCW International Small Cap
BlackRock Small Co. Index
Dimensional US Micro Cap Portfolio Royce Opportunity
$15 \%$
Third Avenue Small Cap Value Brown Capital Mgmt. Small Co. Instl. Buffalo Small Cap Lockwell Small Cap Value

Retirement Porfolio
14.9

Conservative Portfolio
Moderate Portfolio
Aggressive Portfolio
Fidelity Funds Window
61.0
170.3
22.3

Total
59.2
$\$ 725.1$

## More Information and Plan Contacts

To get daily NAVs, account balance information, or to make transfers, you may call the DAP Service Center telephone voice response system, available 24 hours a day. Customer service representatives are available 8:30 a.m. to 8:30 p.m., Eastern time Monday through Friday. Call 1-877-4TWADAP (1-877-489-2327) or dial the AT\&T direct country code and 877-833-9900 (call collect) outside the U.S. Use your Social Security number and PIN to access your account.

The intent of this communication is to provide useful information, not investment advice. Each participant in the Directed Account Plan is ultimately responsible to make his or her own investment decisions.
Information was provided by the Directed Account Plan. Fidelity Investments is not responsible for its content.
Directed Account Plan
3221 McKelvey Road, Suite 105
Bridgeton, MO 63044-2551
314-739-7373
Informational Web Site: www.dapretirement.com Interactive Web Site: www.401k.com


[^0]:    *** expense ratio includes operating expenses and investment manager fees.

    * from Morningstar model portfolios
    $\wedge$ from an advisor recommended asset allocation model

