Directed Account Plan 2011 Year-End Review

January 2012

## **New Regulation means more Disclosure to Participants**

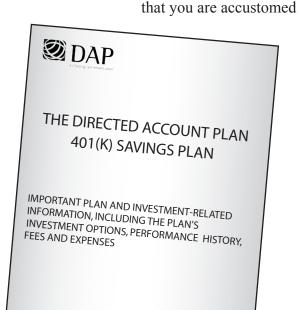
he Department of Labor (DOL) introduced new regulations under section 404a-5 of ERISA. The intent of the regulation is to ensure participants have the information they need to make informed decisions about their investment accounts. The DOL's goal is to provide a more consistent way for participants 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 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 1st deadline that 401(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**

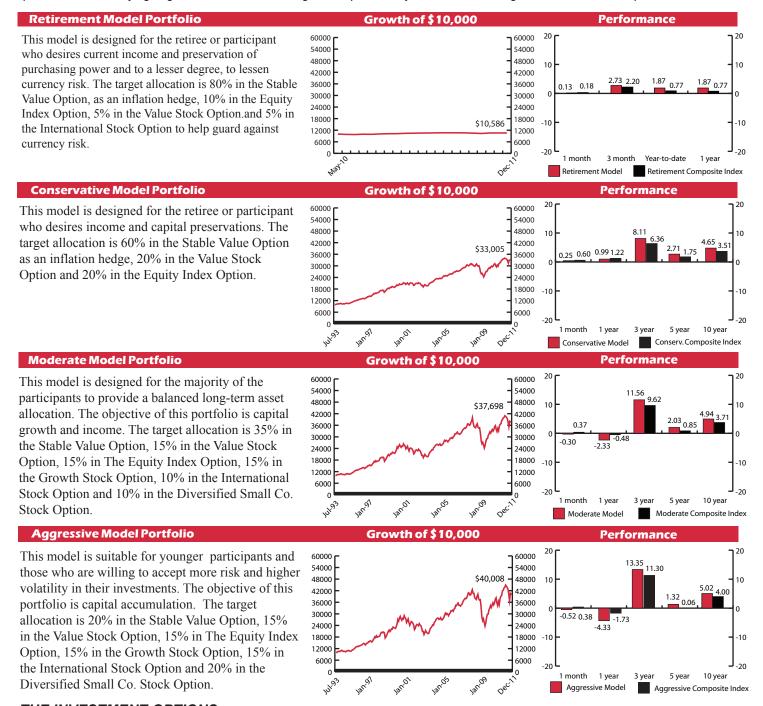
If there is a change to plan-related information such as investment options, plan restrictions, or administrative or individual fees, participants must be notified no less than 30 but no more than 90 days.

#### **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.



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 Growth of \$10,000 Performance 60000 -60000 This option is designed to provide investors with a 54000 54000 return comparable to that of high quality bonds 48000 48000 with less volatility. It invests in a combination of 42000 42000 4.05 3.80 36000 36000 traditional investment contracts, security-backed 30000 30000 \$26,261 investment contracts, actively managed bonds, CDs 24000 24000 and cash. The benchmark is the Lehman Brothers 18000 18000 12000 12000 1-3 Year Govt./Treasury Index. 6000 6000 month 10 year Stable Value BC 1-3 yr. Govt/Treas

#### **Value Stock Option**

#### Growth of \$10,000

#### Performance

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.



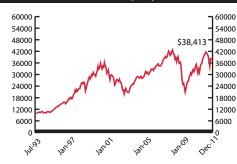


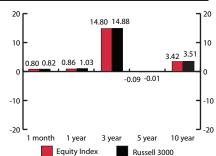
#### **Equity Index Option**

#### Growth of \$10,000

#### Performance

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.



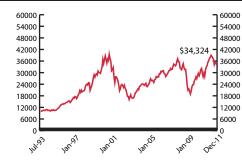


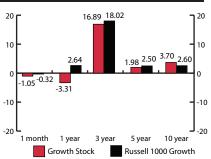
#### **Growth Stock Option**

#### Growth of \$10,000

#### Performance

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.



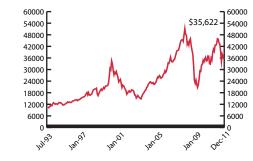


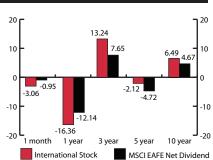
#### International Stock Option

#### Growth of \$10,000

#### Dorformanco

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.



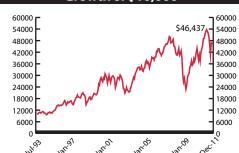


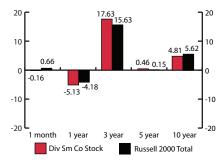
#### **Diversified Small Co. Stock Option**

#### Growth of \$10,000

#### Performance

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

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#### **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<br>(Recordkeeping, Trustee, Administration, Personnel, Communication) | \$849,084       |
| Operating Expenses as a percent of assets  | 11              |
| Approximate Investment Manager Fees *  | 37              |
| Other Mutual Fund Expenses **  | 5               |
| Total DAP Fees and Expenses as a percent of assets -   | 53 basis points |

<sup>\*</sup> mutual fund investment management fee average \*\* includes mutual fund transaction fees, 12b-1 fees, administrative fees, and all other asset-based costs incurred by the funds. Does not include transaction costs of participant activity, which is reflected in each BlackRock NAV, lowering BlackRock fund performance. 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                        | n/a                                |
| Value Stock Option          | 92                        | 90 Large Value<br>103 Mid Value    |
| Equity Index Option         | 18                        | n/a                                |
| Growth Stock Option         | 89                        | 99 Large Growth<br>115 Mid Growth  |
| International Stock Option  | 118                       | 110                                |
| Div. Small Co. Stock Option | 98                        | 104                                |
| Retirement Model            | 38                        | 64^                                |
| Conservative Model          | 42                        | 63*                                |
| Moderate Model              | 63                        | 64*                                |
| Aggressive Model            | 74                        | 95*                                |

<sup>\*\*\*</sup> expense ratio includes operating expenses and investment manager fees.

<sup>^</sup> from an advisor recommended asset allocation model

| 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.

| Investment lands as of December  | 51 31, 2011  | •   |
|--|--|---|
|  | Weight-<br>ings                                    | Net Value<br>of Funds<br>(\$MM)                         |
| Stable Value Fund BlackRock Instl. Money Market Fund/C Invesco Interest Income Wellington Core Bond  | CDs 14%<br>46%<br>40%                              | \$293.5   |
| Value Stock Fund BlackRockValue Index Neuberger Berman Partners T. Rowe Price Value JP Morgan Equity Income Goldman Sachs Mid Cap Value Instl. CGM Focus   | 20%<br>20%<br>20%<br>15%<br>15%<br>10%             | 25.7  |
| <b>Equity Index Fund</b> BlackRock US Equity Index   | 100%   | 16.2  |
| Growth Stock Fund BlackRock Growth Index Marsico Focus Wellington Mid Cap Opportunities Turner Mid Cap Growth T. Rowe Price Growth Stock Primecap Odyssey Growth   | 20%<br>20%<br>10%<br>10%<br>20%<br>20%             | 19.3  |
| International Stock Fund BlackRock EAFE Index 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 | 22%<br>12%<br>12%<br>12%<br>10%<br>10%<br>6%<br>8% | 14.6  |
| Diversified Small Co. Stock Fund<br>BlackRock Small Co. Index<br>Dimensional US Micro Cap Portfolio<br>Royce Opportunity<br>Third Avenue Small Cap Value<br>Brown Capital Mgmt. Small Co. Instl.<br>Buffalo Small Cap<br>Lockwell Small Cap Value  | 20%<br>15%<br>15%<br>15%<br>15%<br>10%<br>10%      | 28.1  |
| Retirement Porfolio<br>Conservative Portfolio<br>Moderate Portfolio<br>Aggressive Portfolio<br>Fidelity Funds Window<br>Total  |  | 14.9<br>61.0<br>170.3<br>22.3<br><u>59.2</u><br>\$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

**2** HEADS UP January 2012 3.DI-C-758B.124

<sup>\*</sup> from Morningstar model portfolios