

SIMPSON THACHER & BARTLETT

425 LEXINGTON AVENUE
NEW YORK, N.Y. 10017-3954
(212) 455-2000

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DIRECT DIAL NUMBER

212-455-7744

Public Avail. Date. 12/28/01 0128200203
Act Section Rule
1934 14(a) 14a-8

VIA FEDERAL EXPRESS

November 15, 2001

Re: The Asia Tigers Fund, Inc. — Omission
of Shareholder Proposal in Proxy Material Pursuant
to Rule 14a-8 of the Securities and Exchange Act of 1934

Securities and Exchange Commission
450 Fifth Street, N.W.
Washington, D.C. 20549
Attention: Office of Disclosure and Review,
Division of Investment Management



Ladies and Gentlemen:

As counsel to The Asia Tigers Fund, Inc. (the "Fund"), a closed-end, non-diversified management investment company registered under the Investment Company Act of 1940 (the "1940 Act"), we are writing to seek confirmation that the Staff (the "Staff") of the Securities and Exchange Commission will not recommend enforcement action if the Fund omits from its proxy statement and form of proxy for its 2002 Annual Meeting of Stockholders (the "Proxy Materials") the stockholder proposal and supporting statement (together, the "Proposal") submitted to the Fund in an undated letter from the President and Fellows of Harvard College, c/o Harvard Management Company, Inc., 600 Atlantic Avenue, Boston, MA 02210 ("Harvard") on October 31, 2001. Pursuant to Rule 14a-8(j)(2) under the Securities Exchange Act of 1934 (the "1934 Act"), enclosed are six copies of each of the following:

COLUMBUS

LOS ANGELES

PALO ALTO

LONDON

HONG KONG

TOKYO

SINGAPORE

1. this letter;
2. Harvard's letter, which contains the Proposal (attached as Exhibit A).

The Fund expects to file its definitive Proxy Materials in January and intends to omit the Proposal pursuant to Rule 14a-8 due to lack of timeliness of the Proposal.

Rule 14a-8(e)(2) establishes the deadline by which stockholder proposals must be submitted for a company's regular scheduled annual stockholder's meeting. The Rule states that a proposal must be received at the company's principal executive offices "not less than 120 calendar days before the date of the company's proxy statement released to shareholders in connection with the previous year's annual meeting."

The Fund's proxy statement for its 2001 annual stockholder's meeting was dated January 12, 2001 and was mailed on January 15, 2001.¹ Accordingly, the deadline for timely receipt of stockholder proposals for inclusion in the Fund's Proxy Materials was September 14, 2001. This deadline was included in the proxy statement for the Fund's 2001 annual stockholder's meeting. The Fund received Harvard's Proposal on October 31, 2001, 47 days after the September 14th deadline. In previous no-action letters, the Commission has strictly defined the timeliness requirements to Rule 14a-8, even in situations where a proposal was received by a company within a few days after the applicable deadline.²

¹ The 2002 Annual Meeting is scheduled to be held within 30 calendar days of the anniversary of the 2001 annual stockholder's meeting, which was held February 16, 2001.

² See Bull & Bear U.S. Government Securities Fund, Inc. (available October 8, 1998) (stockholder proposal received eighteen days after deadline may be omitted); Bristol-

Consequently, we are of the opinion that it may be omitted by the Fund from the Proxy Materials.

In addition, the Fund hereby also requests that the Staff waive the 80-day requirement of Rule 14a-8(j)(1). To comply with this requirement, the Fund would have had to file its no-action request by October 24, 2001. However, the Proposal was submitted on October 31, 2001 which was after the 80-day requirement. This request was filed as soon as practicable. The Staff has previously exercised its waiver of authority in similar circumstances.

In accordance with Rule 14a-8(j) under the 1934 Act, the Fund is contemporaneously notifying Harvard, by copy of this letter, of its intention to omit the Proposal from the Fund's Proxy Materials.

On behalf of the Fund, we hereby respectfully request that the Staff express its intention not to recommend enforcement action if the Proposal is excluded from the Fund's Proxy Materials for the reasons set forth above. If the Staff disagrees with the Fund's conclusions regarding omission of the Proposal, or if any additional submissions are desired in support of the Fund's position, we would appreciate an opportunity to speak to

Myers Squibb Company (available February 5, 1998) (stockholder proposal received three days after deadline may be omitted); Peco Energy Company (available December 29, 1994) (stockholder proposal received one day after deadline may be omitted); Lockheed Corporation (available February 6, 1991) (stockholder proposal received one day after deadline may be omitted); Knight-Ridder, Inc. (available December 26, 1990) (stockholder proposal received one day after deadline may be omitted).

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Securities and Exchange Commission

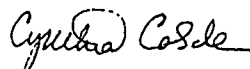
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November 15, 2001

you by telephone prior to the issuance of the Staff's Rule 14a-8(j) response. If you have any questions regarding this request, or need any additional information, please telephone the undersigned at (212) 455-7744.

Please acknowledge receipt of this letter and the enclosed materials by stamping the enclosed copy of this letter and returning it to us in the pre-paid and addressed envelope provided herein.

Very truly yours,



Cynthia G. Cobden

Enclosures

"PROPOSAL: That the Investment Management Agreement between the Fund and Advantage Advisers, Inc. be and hereby is terminated immediately."

Statement:

President and Fellows of Harvard College is a significant long-term shareholder in the Fund. Harvard has held shares in the Fund continuously since August 1995.

Shares of the Fund trade at a substantial discount to their net asset value – 21.99% at October 26, 2001. Harvard believes that the Fund and Advantage Advisers, Inc. have done far too little to eliminate the discount and that continued service by Advantage as investment manager to the Fund is likely to perpetuate the discount.

Many other closed-end funds have undertaken aggressive strategies in recent months to eliminate their discounts, such as substantial tenders for their shares. Such actions require a fund's management to make hard decisions, decisions that will likely result in a reduction of the asset base on which the investment manager's fee is based. Management of the Fund has to date implemented only what Harvard views as an unambitious share repurchase program, which will almost certainly not eliminate the discount.

Termination of the Investment Management Agreement would force the Fund's Board of Directors to consider alternatives to Advantage's high-cost, active-management advisory model. As just one example of such an alternative, the Board might consider management of the Fund by an index-based manager – reducing management fees and providing additional flexibility in the event the Board decides that the persistent discount warrants the conversion of the Fund to an open-ended vehicle or an exchange-traded format.

In any event, Harvard believes that termination of the Investment Management Agreement would place clearly before the Board the task of developing and implementing a program to reduce the Fund's discount to net asset value.



HARVARD
MANAGEMENT
COMPANY, INC.

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600 ATLANTIC AVENUE
BOSTON, MA 02210-2203

(617) 523-4400
FLEX #62189780

The Asia Tigers Fund, Inc.
c/o Simpson Thacher & Bartlett
425 Lexington Avenue
Room 1303
New York, New York 10017-3954

Attention: Secretary

Dear Sir:

Enclosed please find a proposal (the "Proposal") of President and Fellows of Harvard College ("Harvard") to be included in the proxy materials of The Asia Tigers Fund, Inc. (the "Corporation") for the 2002 Annual Meeting of Shareholders.

The following information is provided in accordance with Article II, Section 4(b) of the By-Laws of the Corporation, and Rule 14a-8 under the Securities Exchange Act of 1934, as amended:

- (i) The Proposal and a supporting statement are set out on Attachment 1 to this letter, which provide a description of the business desired to be brought before the meeting and the reasons for conducting such business at the meeting.
- (ii) The interest of Harvard in the Proposal is solely as a shareholder in the Corporation.
- (iii) The Proposal is being submitted by Harvard. Harvard's address is c/o Harvard Management Company, Inc., 600 Atlantic Avenue, Boston, Massachusetts 02210. Harvard's telephone number is (617) 523-4400. Harvard owns beneficially 5,253,400 shares of common stock, \$0.001 par value per share, of the Corporation. Harvard's shares are held of record by the Depository Trust Company, by its nominee, Cede & Co.
- (iv) Harvard intends to appear at the Corporation's 2002 Annual Meeting of Shareholders to present the Proposal.

In accordance with Rule 14a-8, Harvard has included as Attachment 2 to this letter copies of Schedules 13G and 13D, and amendments, reflecting Harvard's ownership of the requisite number of shares of the Corporation before the date on which the one-year eligibility period referred to in that Rule began. In addition, in accordance with Rule 14a-8, Harvard states:

- (a) Harvard has continuously held the required number of shares for the one-year period referred to in Rule 14a-8 as of this date; and
- (b) Harvard intends to continue ownership of those shares through the date of the Corporation's 2002 Annual Meeting of Shareholders.

Harvard is submitting the Proposal at this time in accordance with informal advice of the Division of Corporate Finance of the Securities and Exchange Commission to the effect that if an issuer's principal executive offices were located below 14th Street in New York City at September 11, 2001, and the deadline for submitting a shareholder proposal to that issuer under Rule 14a-8 was on or after that date, then such proposal should be submitted to that issuer after the announced relocation of the issuer's principal executive offices.

Please feel free to contact me if I may be of assistance.

Sincerely,



Enclosures

ROPER & BARTLETT
ROPER & GRAY
ONE INTERNATIONAL PLACE
BOSTON, MA 02110-2624
PHONE: (617) 951-7000
FAX: (617) 951-7050
DIRECT DIAL: (617) 951-7485
LFRASER@ROPERGRAY.COM

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November 20, 2001

BY FEDERAL EXPRESS

Securities and Exchange Commission
450 Fifth Street, N.W.
Washington, DC 20549
Attention: Office of Disclosure and Review, Division of Investment Management

Re: The Asia Tigers Fund Inc. - Shareholder Proposal Submitted Pursuant to Rule 14a-8 under the Securities Exchange Act of 1934

Ladies and Gentlemen:

As counsel to President and Fellows of Harvard College ("Harvard"), we are writing to respond to the letter to you dated November 15, 2001 from Cynthia G. Cobden of Simpson-Thacher & Bartlett, a copy of which is attached hereto (the "Letter"). The Letter seeks your confirmation that the Securities and Exchange Commission will not recommend enforcement action if The Asia Tigers Fund Inc. (the "Fund") omits from its proxy statement and form of proxy for its 2002 Annual Meeting of Stockholders (the "Proxy Materials") a shareholder proposal and supporting statement (together, the "Proposal") submitted by Harvard to the Fund on October 31, 2001.

As described in the Letter, the proxy materials for the Fund's 2001 annual meeting of stockholders identified September 14, 2001 as the deadline for submitting shareholder proposals to be included in the Proxy Materials. Harvard intended to submit the Proposal to the Fund by hand on or about that date. However, following the tragic events of September 11, 2001, Harvard was unable to deliver the Proposal to the Fund's principal executive offices, which were located at One World Financial Center, 200 Liberty Street, New York, New York 10281.

Timothy W. Diggins of this office called the Securities and Exchange Commission on September 14, 2001 to discuss how Harvard should proceed. While he did not specifically mention Harvard or the Fund by name, Mr. Diggins described the situation to Mr. Jonathan Ingram and Mr. Michael Coco of the Staff of the Commission's Division of Corporate Finance. Messrs. Ingram and Coco told Mr. Diggins that, if an issuer's principal executive offices were

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November 20, 2001

located below 14th Street in New York City on September 11, 2001, and the deadline for submitting a shareholder proposal to that issuer under Rule 14a-8 under the Securities Exchange Act of 1934, as amended ("Rule 14a-8"), was on or after that date, then the proposal should be submitted to that issuer as soon as practicable after the announced relocation of the issuer's principal executive offices. Messrs. Ingram and Coco told Mr. Diggins that they had consulted with members of the Staff of the Division of Investment Management, who had expressed their general agreement with this view.

Harvard learned in October that the Fund's offices had been relocated to the offices of Simpson Thacher & Bartlett, 425 Lexington Avenue, Room 1303, New York, New York 10017-3954, and thereafter submitted the Proposal to that address.

Harvard was prepared to file the Proposal during the period between September 11 and September 14. It was physically unable to do so. In light of the severe dislocation caused by the events of September 11 and the fact that the Fund does not even intend to file definitive proxy materials until January, Harvard strongly urges the Commission Staff to deny the Fund's request. Harvard believes that the tragic events of September 11 should not be used to thwart shareholder democracy.

If you have any questions, or would like to receive any additional information, please feel free to contact the undersigned at (617) 951-7485.

A copy of this letter is being provided to the Fund by overnight courier. In accordance with Rule 14a-8(k), we are enclosing six additional copies of this letter. Please acknowledge receipt of this letter by stamping one of the enclosed copies and returning it to our courier.

Very truly yours,

Leigh Fraser
Leigh R. Fraser

Enclosure

cc: The Asia Tigers Fund Inc.
c/o Simpson Thacher & Bartlett
425 Lexington Avenue, Room 1303
New York, New York 10017-3954
Ms. Cynthia G. Cobden
Mr. Jonathan Ingram
Mr. Michael Coco
Mr. Michael S. Pradko
Mr. Steven A. Alperin
Mr. Timothy W. Diggins

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SIMPSON THACHER & BARTLETT

425 LEXINGTON AVENUE
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FACSIMILE (212) 455-2502

DIRECT DIAL NUMBER

E-MAIL ADDRESS

212-455-7744

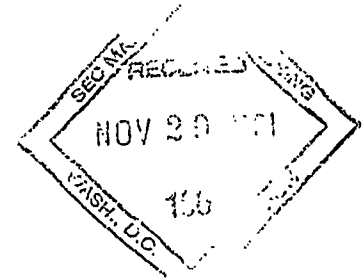
C_Cobden@stblaw.com

VIA FEDERAL EXPRESS

November 28, 2001

Re: The Asia Tigers Fund, Inc. — Omission
of Shareholder Proposal in Proxy Material Pursuant
to Rule 14a-8 of the Securities and Exchange Act of 1934

Securities and Exchange Commission
450 Fifth Street, N.W.
Washington, D.C. 20549
Attention: Office of Disclosure and Review,
Division of Investment Management



Ladies and Gentlemen:

As counsel to The Asia Tigers Fund, Inc. (the "Fund"), we are writing to respond to the letter to you dated November 20, 2001 from Leigh R. Fraser of Ropes & Gray (the "Letter"). The Letter was submitted to you in response to our letter to you dated November 15, 2001, in which we seek confirmation that the Staff of the Securities and Exchange Commission will not recommend enforcement action if the Fund omits from its proxy statement and form of proxy for its 2002 Annual Meeting of Stockholders (the "Proxy Materials") the stockholder proposal and supporting statement (the "Proposal") submitted to the Fund in an undated letter from the President and Fellows of Harvard College, c/o Harvard Management Company, Inc. ("Harvard") on October 31, 2001.

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The Letter states that Harvard was prepared to file the Proposal during the period September 11 to September 14, 2001 and learned in October of the relocation of the Fund's offices and the change in the Fund's mailing address.

The Fund issued a press release on September 26, 2001 announcing the change in the Fund's mailing address due to the events that occurred in New York on September 11, 2001. Harvard's Proposal was submitted to the Fund on October 31, 2001, 35 days after the Fund's press release was issued. A copy of the Fund's press release announcing the change in the Fund's mailing address is attached as Exhibit A.

In addition, Advantage Advisers, Inc. ("Advantage Advisers"), the Fund's investment manager, has an office in Boston. Prior to September 11, 2001, Harvard directly contacted persons in the Boston office of Advantage Advisers, including the Fund's portfolio manager, in connection with the Fund. The operation of the Boston office of Advantage Advisers was unaffected by the events that occurred in New York on September 11, 2001. Harvard maintains that it intended to submit the Proposal to the Fund on or before September 14, 2001, but was "physically unable to do so." Nevertheless, we believe that, given the uncertainty created by the events of September 11, 2001, Harvard had two reasonable alternatives available. First, Harvard could have contacted the Fund at its temporary address promptly after the September 26 press release. Second, Harvard could have contacted any of the persons in the Boston office of Advantage Advisers with which Harvard was familiar and had previously communicated, promptly after September 11, 2001 in order to ask how to submit its Proposal in a timely manner to the Fund.

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Securities and Exchange Commission

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November 28, 2001

Accordingly, we continue to believe that Harvard's Proposal is untimely and should be excluded from the Fund's Proxy Materials.

If you have any questions, or need any additional information, please telephone the undersigned at (212) 455-7744.

A copy of this letter is being provided to Harvard by overnight courier. In accordance with Rule 14a-8(j)(2), we are enclosing six additional copies of this letter. Please acknowledge receipt of this letter by stamping the enclosed copy of this letter and returning it to us in the pre-paid and addressed enveloped provided herein.

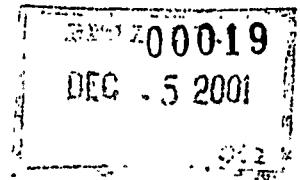
Very truly yours,

Cynthia Cobden by: *MC*
Cynthia G. Cobden

Enclosures

cc: Mr. Jonathan Ingram
Mr. Michael Coco
Mr. Domenic Minore
Ms. Leigh Fraser

ROPES & GRAY
ONE INTERNATIONAL PLACE
BOSTON, MA 02110-2624
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FAX: (617) 951-7050
DIRECT DIAL (617) 951-7485
LFRASER@ROPESGRAY.COM



December 5, 2001

BY HAND DELIVERY

Securities and Exchange Commission
450 Fifth Street, N.W.
Washington, DC 20549
Attention: Office of Disclosure and Review, Division of Investment Management

Re: The Asia Tigers Fund Inc. -- Shareholder Proposal Submitted Pursuant to Rule 14a-8 under the Securities Exchange Act of 1934

Ladies and Gentlemen:

As counsel to President and Fellows of Harvard College ("Harvard"), we are writing to respond to the letter to the Commission dated November 28, 2001 from Cynthia G. Cobden of Simpson Thacher & Bartlett, a copy of which is attached hereto (the "Letter"). In the Letter, the Asia Tigers Fund, Inc. (the "Fund") seeks your confirmation that the Commission staff will not recommend enforcement action if the Fund omits from its proxy statement and form of proxy for its 2002 Annual Meeting of Stockholders a shareholder proposal and supporting statement submitted by Harvard to the Fund on October 31, 2001.

In its earlier letter to the Commission dated November 15, 2001, the Fund had argued that Harvard's proposal should be excluded as untimely because it was not received by the Fund by September 14, 2001, the deadline for submission of proposals for inclusion in the Fund's proxy materials. Harvard had made clear in its cover letter to the Fund accompanying the proposal that Harvard was submitting its proposal following the September 14 deadline due to the dislocation caused by the events of September 11.

The Fund now makes two new arguments. First, it argues that it had issued a press release on September 26 announcing its new mailing address and that Harvard's proposal was not timely submitted after that date. While Harvard regularly monitors developments relating to its investees; it did not, however, become aware of that press release until October 8, when Harvard first read the relevant Bloomberg report. The Fund did not file the press release with the

Revision of Asia Tigers Proposal (2)1.DOC

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-2-

December 5, 2001

Commission on Form 8-K, nor did it notify shareholders by mail or other direct communication of its new address.

Once Harvard had actual notice of the change, it acted promptly to submit the proposal, which required a review of the Fund's then current situation to assure continued appropriateness of the arguments, data and factors included in the proposal that Harvard had been prepared to file in September. These matters included investment and stock performance information, market conditions in both the U.S. and Asia, and any intervening efforts by the Fund to eliminate its extreme discount. As a result of this review, Harvard in fact made changes to the supporting statement which it had originally drafted.

Harvard had been prepared to file its proposal in September on a timely basis. Given that Harvard had no way of knowing when the Fund would announce the reopening of its principal office, Harvard simply could not have been in a position to responsibly file immediately upon learning of the reopening. Harvard's counsel had consulted the Commission staff specifically in order to ensure its ability to file as soon as practicable after the Fund's offices had reopened. Harvard believes that it was entitled to a reasonable period of time – which did not result in any substantial prejudice to the Fund – to review and resubmit its proposal to the Fund after learning of the Fund's new address.

The Fund's argument that Harvard should have contacted the Boston office of the Fund's adviser in order to submit the proposal appears disingenuous at best. Harvard has little doubt but that if it had attempted to submit a proposal through the adviser's Boston office, the Fund would now be arguing that the proposal had not been properly submitted, just as the Fund is now arguing that it is untimely. Harvard had no reason to believe – and was given no reason to believe – that this office had any authority to act on behalf of or bind the Fund as to this matter. Furthermore, in employing hindsight to say that Harvard should have used active efforts to try to submit its proposal, the Fund has lost sight of an important part of the recent picture. The interests of the nation and the capital markets dictated that businesses affected by the September 11 tragedy be given every opportunity to reestablish themselves on their own time schedules. While it remained unaware of the Fund's status and location, Harvard would not, and would not be seen to, press a proposal to terminate the Fund's adviser.

Harvard has acted reasonably and promptly at all times in attempting to submit its proposal under the difficult circumstances presented by the tragic events of September. The Fund should not be able to use those events to its benefit to exclude Harvard's proposal.

If you have any questions, or would like to receive any additional information, please feel free to contact the undersigned at (617) 951-7485.

ROPES & GRAY

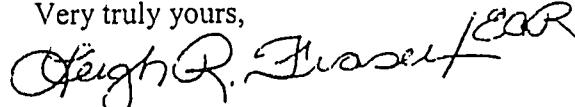
Securities and Exchange Commission

-3-

December 5, 2001

A copy of this letter is being provided to the Fund by overnight courier. In accordance with Rule 14a-8(k), we are enclosing six additional copies of this letter. Please acknowledge receipt of this letter by stamping one of the enclosed copies and returning it to our courier.

Very truly yours,


Leigh R. Fraser

Enclosure

cc: The Asia Tigers Fund Inc.
c/o Simpson Thacher & Bartlett
425 Lexington Avenue, Room 1303
New York, New York 10017-3954
Ms. Cynthia G. Cobden
Mr. Jonathan Ingram
Mr. Michael Coco
Mr. Michael S. Pradko
Mr. Steven A. Alperin
Mr. Timothy W. Diggins



DIVISION OF
INVESTMENT MANAGEMENT

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

00022

December 28, 2001

ACT SEA of 1934

SECTION
RULE 14a-8(e)(2)

POSTAL
AVAILABILITY December 28, 2001

VIA FIRST CLASS MAIL

Cynthia G. Cobden, Esq.
Simpson Thacher & Bartlett
425 Lexington Avenue
New York, New York 10017-3954

Re: The Asia Tigers Fund, Inc. (the "Fund")
Shareholder Proposal of the President and Fellows of Harvard College

Dear Ms. Cobden:

In letters dated November 15 and 28, 2001, you requested confirmation that we would not recommend enforcement action to the Commission if the Fund omits from its proxy soliciting materials for its 2002 annual meeting of shareholders (the "Proxy Materials") a shareholder proposal (the "Proposal") submitted by the President and Fellows of Harvard College (the "Proponent"). The Proponent's Proposal states "[t]hat the Investment Management Agreement between the Fund and Advantage Advisers, Inc. be and hereby is terminated immediately."

In support of your request, you assert that the Proposal may be omitted pursuant to Rule 14a-8 under the Securities Exchange Act of 1934 because the Proponent did not timely submit it.

Background

You represent that the Proponent submitted the Proposal to the Fund on October 31, 2001. The stated deadline for the timely receipt of a shareholder proposal for inclusion in the Fund's Proxy Materials for the next annual meeting was September 14, 2001. This deadline was stated in the proxy statement sent to shareholders in connection with the Fund's 2001 annual meeting of shareholders. In a letter dated November 20, 2001, Proponent's counsel acknowledges that the deadline was included in the Fund's proxy statement and asserts that the Proponent intended to submit the Proposal to the Fund by hand on or about the deadline date. However, following the tragic events of September 11, 2001, the Proponent was unable to deliver the Proposal to the Fund's principal executive offices, which were located at One World Financial Center, 200 Liberty Street, New York, New York 10281.

The Fund issued a press release on September 26, 2001, announcing the change in its mailing address. In a letter dated December 5, 2001, Proponent's counsel states that, while the Proponent regularly monitors developments relating to the companies in which

Public Reference Copy

it invests, the Proponent did not become aware of that press release until October 8, 2001. On October 31, 2001, the Proponent submitted its Proposal at the Fund's new mailing address.

Conclusion

We are unable to concur with your view that the Proposal may be omitted from the Fund's Proxy Materials. The Proponent's timely delivery of its Proposal was precluded by the tragic events of September 11, 2001. Accordingly, under these unique circumstances, we cannot assure you that we would not recommend enforcement action if the Fund omits the Proposal from its Proxy Materials.

* * *

In connection with the foregoing, your attention is directed to the attachment, which sets forth a brief discussion of the Division of Investment Management's informal procedures regarding shareholder proposals. If you have any questions or comments, you may contact me at (202) 942-0627.

Sincerely,

Dominic J. Minore

Dominic J. Minore
Senior Counsel
Office of Disclosure and Review

by JFM

Attachment

cc: Leigh R. Fraser, Esq.
Ropes & Gray
One International Place
Boston, MA 02110-2624