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**VIA E-MAIL**

October 2, 2024

Ms. Lisa Larkin  
Division of Investment Management  
U.S. Securities and Exchange Commission  
100 F Street N.E.  
Washington, D.C. 20549

**Re: Shareholder Proposals Submitted by Judith Blanchard, Alyse Simon, John McDiarmid, Shoshana Grossman-Crist, and Mary Rosczyk**

Dear Ms. Larkin,

As requested, please find below a summary of the procedural no-action letter proponents and responses as of October 2, 2024. In our cover letter to proponents, dated September 3, 2024, we asked that they respond within 20-days of receipt of the letter with evidence of their ownership in the below funds. As shared with the Staff on September 24, 2024, Mary Rosczyk confirmed she no longer held shares of a certain fund.

<b>Procedural No-Action Letter Proponent</b>	<b>Fund</b>	<b>Reached out regarding shares owned outside of Vanguard (Yes/No)</b>	<b>Response from Proponent</b>
Judith Blanchard	Vanguard Dividend Appreciation Index Fund	Yes	No response
	Vanguard Short-Term Corporate Bond Index Fund	Yes	No response
Alyse Simon	Vanguard Developed Markets Index Fund	No	Proponent disclaimed ownership prior to no-action relief request
	Vanguard Equity Income Fund	No	Proponent disclaimed ownership prior to no-action relief request
John McDiarmid	Vanguard GNMA Fund	Yes	No response
	Vanguard Inflation-Protected Securities Fund	Yes	No response
	Vanguard Intermediate-Term Investment Grade Fund	Yes	No response
	Vanguard Long-Term Investment Grade Fund	Yes	No response
	Vanguard Long-Term Treasury Fund	Yes	No response

	Vanguard Short-Term Federal Fund	Yes	No response
	Vanguard Short-Term Treasury Fund	Yes	No response
	Vanguard Total Bond Market Index Fund	Yes	No response
Shoshana Grossman-Crist	Vanguard Short-Term Investment-Grade Fund	Yes	No response
Mary Rosczyk	Vanguard Value Index Fund	Yes	Proponent withdrew proposal with respect to this Fund

Should the Staff have any questions regarding any aspect of this letter or require any additional information, please contact the undersigned at 212-698-3889 or [stephen.bier@dechert.com](mailto:stephen.bier@dechert.com).

Sincerely,

Stephen H. Bier

cc: [IMshareholderproposals@sec.gov](mailto:IMshareholderproposals@sec.gov)