



Reallocation Commentary

November 6, 2007

Recent valuation readings of international stocks have led us to make several sector adjustments in ICON's Frontier Portfolios. According to our calculations, the value-to-price (V/P) ratio of the Asia-Pacific region has declined to 1.17, notably lower than our valuation measurements for Europe (1.21) and the U.S. (1.20), so we are shifting some assets in the ICON Frontier Portfolios away from Asia and into Europe.

Europe has the highest V/P of all global regions we follow, and to take advantage of this value, we are increasing the Portfolios' positions in the Telecommunication & Utilities and Leisure and Consumer Staples sectors within Europe.

Nevertheless, we continue to find good opportunities in the Asia-Pacific region on an industry and country basis. However, many companies are exhibiting large discrepancies of value-to-price and relative strength within countries. For example, Japan's V/P is 1.38 and relative strength is 0.94 versus China's V/P of 0.95 and relative strength of 1.24.

While relative strength and stock performance following the market lows on August 16, 2007 continue to be in Asia's favor, we believe a gradual shift out of the region is optimal. The Frontier Portfolios have had a sizable overweight position in Asia-Pacific year-to-date, and with the recent strength in the region and declining value as a whole, our system indicates a paring of this allocation.

***Past performance does not guarantee future results.** Opinions and forecasts regarding industries, companies, countries, and/or themes, and portfolio composition and holdings, are all subject to change at any time, based on market and other conditions, and should not be construed as a recommendation of any specific security.*

Management of the Portfolios involves sector allocation overlays using sector and diversified mutual funds as the investment vehicle. ICON is the investment adviser to mutual funds in which the Portfolios invest and receives a management fee from the funds for its advisory services.

An investment in a sector fund may involve greater risk and volatility than a diversified fund. Investments in international securities may entail unique risks, including political, market, regulatory and currency risks. Financial statements of foreign companies are governed by different accounting, auditing, and financial standards than U.S. companies and may be less transparent and uniform than in the United States. Many corporate governance standards, which help ensure the integrity of public information in the United States, do not exist in foreign countries. In general, there is less governmental supervision of foreign stock exchanges and securities brokers and issuers. An investment in a region fund may involve greater risk and volatility than a more diversified fund.

Fee Schedule

Account Value	Frontier Allocation Series
First \$250,000	0.25%/month (3.0%/year)
Next \$500,000	0.21%/month (2.5%/year)
Next \$250,000	0.17%/month (2.0%/year)
More than \$1 million	Negotiable

*ICON's value-to-price ratio is a ratio of the intrinsic value, as calculated using ICON's proprietary valuation methodology, of a broad range of domestic and international securities within ICON's system as compared to the current market price of those securities. ICON's relative strength ratio is a ratio of the performance for the preceding six months of a group of securities within ICON's universe as compared to the preceding six-month performance of the broad market. To analyze intrinsic value, the ICON valuation methodology relies on the integrity of publicly released **financial statements**.*

If you would like to receive, at no charge, the most recent copy of ICON's disclosure document, Form ADV Part II, please send your request in writing to: Attention: Compliance, ICON Advisers, Inc., 5299 DTC Boulevard, 12th Floor, Greenwood Village, CO 80111.

