

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

OMB APP	ROVAL
OMB Number:	3235-0104
Estimated averag	je burden
nours per respons	se 0.5

INITIAL STATEMENT OF BENEFICIAL OWNERSHIP OF SECURITIES

Filed pursuant to Section 16(a) of the Securities Exchange Act of 1934 or Section 30(h) of the Investment Company Act of 1940

(Print or Type Responses)											
1. Name and Address of Reporting Person* BANK OF AMERICA CORP /DE/		of Event Rent (Month/I 2009				I Ticker or Tradi ESTMENT Q	~ ,	NICIPAL FUND INC			
(Last) (First) (Middle) BANK OF AMERICA CORPORATE CENTER, 100 N TRYON ST				Issuer	Check a	Reporting Person	Filed(Mon	ndment, Date Original th/Day/Year)			
(Street) CHARLOTTE, NC 28255				Officer below)	(give title		6. Individ	ual or Joint/Group Filing(Check .ine) ed by One Reporting Person led by More than One Reporting Person			
(City) (State) (Zip)			Т	able I - Non-De	rivati	ve Securities	Beneficially O	wned			
1.Title of Security (Instr. 4)		В		nt of Securities ally Owned	F (I (I	orm: Direct D) or Indirect	4. Nature of Indire (Instr. 5)	ct Beneficial Ownership			
Auction Rate Preferred		9	90 (1)			I	By Subsidiary				
Reminder: Report on a separate line for each class of Persons who respondences the form displayed Table II - Derivative	d to the c ays a cur	ollection rrently va	of info	ormation containe B control numbe	ed in th		·				
(Instr. 4)	Date Exer nd Expirati fonth/Day/Ye	on Date			rivative	Price of Derivative	5. Ownership Form of Derivative Security: Direct	6. Nature of Indirect Beneficial Ownership (Instr. 5)			
	ate xercisable	Expiration Date	Title	Amount or Number Shares	r of	Security	(D) or Indirect (I) (Instr. 5)				

Reporting Owners

		Relationsl	hips	
Reporting Owner Name / Address	Director	10% Owner	Officer	Other
BANK OF AMERICA CORP /DE/ BANK OF AMERICA CORPORATE CENTER 100 N TRYON ST CHARLOTTE, NC 28255		X		
BANK OF AMERICA NA BANK OF AMERICA CORPORATE CENTER 100 N TRYON ST CHARLOTTE, NC 28255		X		
MERRILL LYNCH, PIERCE, FENNER & SMITH INC. 4 WORLD FINANCIAL CENTER NORTH TOWER NEW YORK, NY 10080		X		

Signatures

/s/ Debra I. Cho, Senior Vice President, Bank of America Corporation	02/10/2009
**Signature of Reporting Person	Date
/s/ Debra I. Cho, Senior Vice President, Bank of America, NA	02/10/2009
**Signature of Reporting Person	Date

/s/ Pia Thompson, Assistant Secretary, Merrill Lynch, Pierce, Fenner & Smith, Inc.	02/10/2009
**Signature of Reporting Person	Date

Explanation of Responses:

- * If the form is filed by more than one reporting person, see Instruction 5(b)(v).
- ** Intentional misstatements or omissions of facts constitute Federal Criminal Violations. See 18 U.S.C. 1001 and 15 U.S.C. 78ff(a).
- The Auction Rate Preferred Shares ("Shares") reported in Table 1 represent 647 Shares beneficially owned by Merrill Lynch, Pierce, Fenner & Smith, Inc. ("MLPFS") and (1) 343 Shares beneficially owned by Bank of America, N.A. ("BANA"). MLPFS and BANA are each indirect, wholly owned subsidiaries of Bank of America Corporation ("Bank of America").

Remarks:

The Shares reported herein represent Bank of America's combined holdings in multiple series of auction rate preferred securities of the issuer, which are treated herein as one class of securities in accordance with the Auction Rate Securities-Global Exemptive Relief no-action letter issued by the Securities and Exchange Commission (SEC) on September 22, 2008. Bank of America undertakes to provide upon request by the SEC, the issuer or a security holder of the issuer, complete information regarding the number of equity securities of the issuer purchased or sold at each different price and date of all transactions in such securities that occurred after Bank of America became a 10% owner but prior to the date of this filing.

Note: File three copies of this Form, one of which must be manually signed. If space is insufficient, See Instruction 6 for procedure.

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB number.