

Cost Basis Steering Committee Meeting Minutes
January 21, 2014, Noon – 1 p.m.

I. Approval of January 7, 2014 Meeting Minutes

- The committee approved the minutes as written.

II. Issues discussed

- A new rule will be added in November 2014, applicable to the records with an OCC number or Fed identifier that will exempt those entities from the rule that purges an ‘inactive’ record 18 months after it is set up on the CBRS User Master File.
- In regards to passing cost basis on Fed items, Discussion revolved around the difficulty of how to tell the difference between an ACATS item and a non-ACATS item on an expectancy file.
 - On output from the Fed, there is a valued/free indicator. All broker-to-broker ACATS are valued items. Free items can be either bank ACATS, or non-ACATS items. CBRS users need to determine how to distinguish between bank ACATS and non-ACATS items in order to know whether to use transaction type 01 = ACATS or 06 = Other Depository Deliveries on the user’s expectancy file.
 - There may be a field on the input to the Fed to enter the ACATS control number, so the deliverer can tell the receiver that the Fed transfer is an ACATS item.
 - The timing variable further complicates the reconciliation. For example:
 - Monday: Deliverer sends ACATS item through the Fed.
 - Tuesday: Deliverer sends cost basis.
 - BUT: the receiver may have added the item to its expectancy file on Monday under Transaction Type 06 = Other Depository Delivery, because the receiver did not know it was an ACATS item. Receiver gets cost basis under transaction type 01 = ACATS on Tuesday, and cannot match the basis to the Fed transfer because of the Transaction Type discrepancy.
 - *More input is needed from other members of the committee to understand how to establish the linkage.*
- It was agreed to remove Parking lot issues:
 - #1 – Is Non-Qualified Stated Interests (NQSI) relevant for CBRS? *Pending a discussion with Bob Linville.*
 - #10– The need for the **Enhancement for Exempt Recipient Accounts Indicator** has not proved necessary after 3 years.
- Issue #8 – If brokers use Networking Transaction Type 4 for ‘one-off’ transfers, what are the implications for CBRS? Will participants program their expectancy files to include these transfers? This issue should stay on the Parking Lot list:
 - A separate committee is determining whether Networking Transaction Type 4 can be used for other purposes. These other purposes are:
 - Mass conversion – it may be necessary to use CBRS in this case; the deliverer and receiver of the conversion decide whether to use CBRS or pass basis outside of CBRS
 - One-off movement—the deliverer and receiver will use CBRS in this case

- ACATS fail—where the basis was sent previously and is not needed again.
 - The decision as to whether brokers/funds will use the existing Networking Transaction Type 4 for these three purposes, or create new Transaction Types in Networking, is still open. Once that decision is made, this committee can decide what changes to CBRS, or CBRS Best Practices, are needed related to this issue.
- **Next Meeting:** Tuesday, January 28, 2014, Noon – 1 PM eastern

Parking Lot

1. **For 2017, do we need a new field for nonqualified stated interest (NQSI)?**
2. **Should preferred stock be treated as fixed income?** This question was concerning contingent payment debt, and does not need to be resolved until 2016. CBRS may need a new asset category for preferred stock.
3. **Do we need a history table of elections?** On 5/28/2013, the committee decided to table this decision for the time being. This may be a requirement for a future release, but not for June 2014.
4. **Can we consolidate some of the asset categories, such as use OPT for options, warrants, and rights, and remove the types WAR and RGT?** Waiting for final fixed income/options regulations to further discuss this question.
5. **Best Practices around inactive Master File records.**
 - What criteria should a receiving firm use to match the CBRS record to an asset transfer? The assumption is the active broker will be able to apply the cost basis. What are the obstacles to this assumption? Funds that send their file to CBRS after 4 PM may not be able to use the inactive record until the second day it is on the Master File.
 - An active user may not be able to accept records sent to it on behalf of one of its inactive users. For example, an active CBRACK user cannot accept records for most transaction types. (Brought up on CBRS Working Group call, 05/10/2012)
6. **ACATS Asset Sequence Number field:** *Should the ACATS Asset Sequence Number not be required if the submitting user is type NSCPRT (i.e., a mutual fund)?* The committee agreed that, at this time, DTCC will not create an edit saying that the ACATS Asset Sequence Number should not be required if the submitting user is type NSCPRT. In theory, a fund should not have to pass cost basis on an ACATS transfer that occurs between two broker-dealers. However, in practice, broker-dealers sometimes transfer fund-controlled assets through ACATS. This issue occurs in approximately less than 1% of ACATS transfers involving funds. The ultimate goal is to eliminate a fund having to send cost basis information on assets passed through ACATS. This is an open issue, to be discussed by this committee and other groups.
7. **Are funds expected to pass cost basis to a broker-dealer on fund-controlled assets that are transferred via broker-to-broker conversion (Transaction Type 04 = Conversion)?** Funds have not programmed to transfer basis for Transaction Type 04 = Conversion. This is an open issue, to be discussed by this committee and other groups.

8. **If brokers use Networking Transaction Type 4 for ‘one-off’ transfers, what are the implications for CBRs? Will participants program their expectancy files to include these transfers?**
9. **Should the Receiver Customer Account Number be required for Conversions?**
10. **Default format for Transfer Control Number for foreign asset transfers (Transaction Type 06 = Other Depository Deliveries).** There are two proposed formats for TCN for foreign asset transfers: Julian date (3 bytes) + sequence number (3 bytes) + CUSIP (9 bytes) + deliverer account number (15 bytes) [or receiver account number if deliverer account number is not available]; or the “D format” follows the format below:
 - Position 1: ‘D’ = Direct Transfer Indicator
 - Position 2-5: NSCC Participant Number for the Fund
 - Position 6: Last Digit of Current Year
 - Position 7-9: Julian Date
 - Position 10-15: Unique Number (randomly-generated, sequential)

A primary difference in these formats is their length: the ‘D’ format is 15 bytes; the first format (‘Kevin’s format’) is 30 bytes. How will deliverer/receiver agree on the TCN? Is there a consistent number for each contra party across the various depositories in different countries?
11. **How should Transaction Type 07 = Physical Movement Settlement be used?** This transaction type applies to Alternative Investments, Limited Partnerships, Private Placements; not stock certificates and mutual fund certificates. Fields that may be used for Transaction Type 07 = Physical Movement Settlement: Transfer Control Number; Alternate Control Number; Receiver/Deliverer Customer Account Number; Asset Category: require certain types?; Date Transfer was Initiated/Settlement Date of Transfer; Noncovered/Pending Indicator; Acquisition Date of Tax Lot; Tax Lot Current Cost/Tax Lot Original Cost [9/27/2011: this issue has been designated as lower priority. The security types applicable to this transaction type are not currently covered by the regulations.]
12. **Possible future enhancement:** Create a new CBRs TCN file from DTC for both transfer agents and broker-dealers, to inform both parties of the TCNs for their DTC transactions for a given day; pre-populate WebDirect screens with information from DTC deposit tickets.

Closed Parking Lot issues

1. **Enhancement for Exempt Recipient Accounts Indicator.** Provide three categories on the master file, from which a user could choose what kind of basis it wants to receive. Categories: 1) send all basis; 2) send everything except retirement accounts; 3) send no non-covered accounts (include an edit to this option). The committee will revisit this issue after the existing version of the Exempt Recipient Accounts Indicator has been in place for a few months; and after committee members have had the opportunity to research the issue and quantify the cost of records sent and received for non-covered non-retirement accounts. Issue closed on 01/21/2014. This is an issue opened in 2012: the indicator has been in use for two years, and the committee feels that this enhancement to the indicator is not necessary.
2. **Compensatory options:** should there be an indicator that allows the deliverer to indicate that shares were purchased with a compensatory option, and is it possible for the actual option to transfer. Closed 04/23/2013; Final regulations say No to this question.

3. Which value is more important, the ACATS Asset Sequence Number, or the CUSIP? Closed 11/29/2011. On 11/29/2011, the committee discussed the question, if the ACATS Asset Sequence Number does not match the CUSIP on the CBRS record, which data element should the contra party use? The group decided that the ACATS Asset Sequence Number is the value to use in this case.
4. Should CBRACT be a valid firm type for other transaction types? Closed 09/20/2011. From minutes: Earlier this year a firm asked to join CBRS as a CBRS-only user to pass basis on ACATS transactions. CBRS does not allow type CBRACT to pass basis on an ACATS transaction, so this firm did not pursue this option. However, this situation led to the question of whether CBRACT should be a valid submitting/contra type for more transactions than it is currently valid for today. The committee discussed this issue, and decided against making CBRACT a valid type for additional transactions: allowing CBRS-only users to submit/receive for additional transaction types may cause more breaks. If an issue arises in the future for a specific CBRS user, the committee can revisit the issue at that time. For now the issue will be moved to the “Closed Parking Lot Issues” list.
5. Should the Deliverer Customer Account Number be required for all transactions? Closed 09/20/2011. The committee agreed on a Best Practice where if the receiver of the asset provides the Deliverer Customer Account Number on the asset transfer, the submitter of the CBRS record should provide it in CBRS. The number should not be required in CBRS: it will not always be available, and there are times when the submitter of the CBRS record is not willing to provide it. This issue is now closed, and will be moved to the “Closed Parking Lot Issues” list.
6. Mutual funds passing cost basis on 01 = ACATS transactions for fund-controlled assets. Closed 09/28/2011. The committee discussed that this is a problem related to a low volume of transfers. Various service bureaus are making changes to prevent firms from transferring mutual funds that are Level 4, fund-controlled assets, which will help to reduce the potential for a firm to receive cost basis from both a firm and a fund. There may be changes to ACATS-Fund/SERV files to help address this issue as well. Groups outside the Steering Committee are working on this issue, so this is a closed issue for this committee.
7. User CUSIP issue part 3, adding ACATS sequence number to CBRS record. Closed 10/04/2011. The committee agreed to add the ACATS sequence number to the CBRS record.
8. New fields needed to support the passing of cost basis on a gift denominated in a foreign currency. Closed 10/11/2011. The committee agreed to add this new field to the requirements for future CBRS enhancements: CBRS needs a new exchange rate field corresponding to the Fair Market Value (FMV) of the Date of Gift. A new currency code field is not necessary.
9. Best Practice about how to populate the deliverer/receiver customer account numbers for mutual fund transfers. Closed 11/08/2011. This question came after of a discussion on the CBRS Working Group call. The question has not come up again, so this issue is currently closed. If customers revive the question, Lydia will bring up the issue again.
10. Remove Purchase/Dividend Reinvestment Indicator? Closed 2/7/2012. While the indicator is optional and not many CBRS users populate it, some users have said that they do use it, so the committee decided to keep the indicator on the record.
11. “Exchange Rate” field. Do we need to specify that this is the exchange rate for the Tax Lot Current Cost? Do we need another field for the exchange rate for the Tax Lot Original Cost?

Would new fixed income cost fields (e.g. OID, bond premium) need exchange rates also?
Closed 2/7/2012. The committee determined that the record layouts do not need new exchange rate fields. Lydia will add language to the comments for the existing 'Exchange Rate' field to clarify that the field corresponds to the Tax Lot Current Cost field and/or the Tax Lot Original Cost field.

12. Networking Control Number not unique from year to year: may cause a problem when passing cost basis starting in 2013. Proposal: add a year to the number, e.g.: JJJY9999999, where JJJ = Julian date, Y = last digit of the year, 9999999 = seven digit sequential number. Jeff Naylor and Yana will take the lead on this proposed change (6/5/2012). 8/28 Note: this proposal was submitted to DTCC Wealth Management, and tentatively will be scheduled for implementation during 2013.