

**Cost Basis Steering Committee Meeting  
Minutes**

November 29, 2011, Noon – 2 p.m.

I. Approval of November 22, 2011 Meeting Minutes

- The Committee approved the minutes as written.
- Bob asked that the issue about whether the Receiver Account Number should be required for Conversions be added back to the Parking Lot. Lydia will do so.

II. Issues discussed

- Lydia reminded the group that December 16, 2011 is the deadline to receive business requirements from the committee in order to include them in a mid-year 2012 release.
- Lydia asked the committee whether another output cycle for CBRS, with a potential Noon cut-off time, would be helpful. Some committee members expressed that it would not be harmful, but wouldn't be particularly useful either. Committee members who use WebDirect said they would not want to have to download two end-of-day files per day.
- *Best practice about the request for ACATS transaction type and blank CUSIP means requesting the whole account:* The committee removed this best practice earlier in 2011, but the code allows for it (i.e. DTCC coded for the best practice). The committee decided to leave the code as is, but for a different reason. CBRS allows for the ISIN Security Issue ID (CUSIP) field to be blank for request records for ACATS transfers. The reason for this rule is that a request for an ACATS asset could have a User CUSIP, in which case the submitter of the request may not know the CUSIP on the request receiver's books. In the future, submitters will be able to use the new field for ACATS Asset Sequence Number to let the contra side know to which asset the request corresponds.
  - 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.
  - DTCC's Help Desk received a call with this question: if an ACATS transfer has 100 assets in it, should the submitter send 100 request records? The answer to this question is yes. The assumption is that most, if not all, CBRS users have programmed to send requests on the asset level, not on an account level. DTCC has a report that lists how many requests have been sent for the entire ACATS transfer have been sent per day, and for the reports that Lydia has reviewed, she has never seen anyone sending one of these requests.
- The committee discussed new requirements for CBRS based on the recently released proposed IRS regulations. The committee will continue to discuss these requirements over the next few months. DTCC will implement changes for fixed income and option assets in a late 2012 release, tentatively November.
  - Both Original and Current Cost are required for fixed income assets.
  - The committee discussed that either both Yield and Date you're amortizing to should be required, or neither, but not just Yield.
  - Indicator for Equity-based Compensation Arrangement.

III. Next Meeting: Tuesday, December 6, 2011, Noon – 2 PM eastern

## Parking Lot

1. **Should the Receiver Customer Account Number be required for Conversions?**
2. **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 (CBRS could systematically 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.
3. **Which value is more important, the ACATS Asset Sequence Number, or the CUSIP?** 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. **How should Transaction Type 06 = Other Depository Deliveries (e.g. FED) be used?** What fields should be required for this type? What fields need additional rules for this type? What fields need Best Practices for this type?
5. **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?
6. **Remove Purchase/Dividend Reinvestment Indicator?**
7. **Additional rules for fixed income assets:** (The committee will review this issue as the IRS issues more guidance.)
  - a. Cost fields
  - b. New Zero Basis Indicator to point to Tax Lot Original Cost?
  - c. Best Practice: For bonds, the Fair Market Value as of Date of Gift field should contain the original, not adjusted, market value
8. **How should Transaction Type 07 = Physical Movement Settlement be used?** 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.]

**Future enhancements  
(agreed upon by the Committee)**

1. When the wash sale date is populated, it would always be equal or earlier than the acquisition date.
2. Add an edit that says Tax Lot Current Cost cannot be unknown if the lot is covered.
3. Add the ACATS asset sequence number to the Asset Input record. Required for transaction type 01 = ACATS; and required for all record content indicator types (original, corrected, firm reject, request).
4. New exchange rate field on the Tax Lot record corresponding to the Fair Market Value (FMV) of the Date of Gift.
5. The Deliverer Customer Account Number should be required for Transaction Type 04 = Conversions.
6. Add an edit that the Deliverer Customer Account Number and Receiver Customer Account Number should be required for Transaction Type 56 = Networking Transaction. [Note: include in mid-year 2012 release only if the Networking change that would help with this requirement will be in place before this change would be deployed to production; otherwise, wait until the year-end 2012 release.]

**Closed Parking Lot issues**

1. 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.
2. 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.
3. 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.\_
4. 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.

5. 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.
6. Best Practice about how to populate the deliverer/receiver customer account numbers for mutual fund transfers. Closed 11/08/2011. This question came about as the result 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.