

MEMO# 26214

June 4, 2012

ICI Draft Letter to OCC Regarding Proposal to Revise Requirements for Short-Term Investment Funds

[26214]

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TO: MONEY MARKET FUNDS ADVISORY COMMITTEE No. 38-12
MUNICIPAL SECURITIES ADVISORY COMMITTEE No. 23-12
SEC RULES COMMITTEE No. 35-12 RE: ICI DRAFT LETTER TO OCC REGARDING PROPOSAL TO
REVISE REQUIREMENTS FOR SHORT-TERM INVESTMENT FUNDS

As you know, the Office of the Comptroller of the Currency (“OCC”) has issued a notice of proposed rulemaking that would revise the requirements imposed on banks pursuant to 12 CFR 9.18(b)(4)(ii)(B), the short-term investment fund (“STIF”) rule, by adding safeguards designed to address the risk of loss to a STIF’s principal. [*] ICI has drafted a comment letter, which supports the OCC’s efforts to improve investor protection by strengthening the resilience of STIFs and increasing the transparency of these products. Specifically, the draft letter states that we are pleased to see that the OCC’s reform efforts have been “informed by” the Securities and Exchange Commission’s 2010 amendments to Rule 2a—7, which have been responsible for strengthening money market funds, another type of fund that also seeks to maintain a stable net asset value.

Comments are due to the OCC by Friday, June 8. Please therefore send your comments to jheinrichs@ici.org by close of business, Thursday, June 7.

Jane G. Heinrichs
Senior Associate Counsel

[Attachment](#)

endnotes

[*] See Short-Term Investment Funds, Department of the Treasury, Office of the

Comptroller of the Currency, 77 FR 21057 (April 9, 2012), available at <http://www.gpo.gov/fdsys/pkg/FR-2012-04-09/pdf/2012-8467.pdf>.

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