

MEMO# 30454

December 5, 2016

ICI Submits Comment Letter on SEC's Amendment to Securities Transaction Settlement Cycle Proposal

[30454]

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TO: Accounting/Treasurers Committee
Derivatives Markets Advisory Committee
Equity Markets Advisory Committee
ETF (Exchange-Traded Funds) Committee
ETF Advisory Committee
Fixed-Income Advisory Committee
International Operations Advisory Committee
Operations Committee
SEC Rules Committee
Securities Operations Subcommittee
Small Funds Committee
Transfer Agent Advisory Committee RE: ICI Submits Comment Letter on SEC's amendment to Securities Transaction Settlement Cycle Proposal

Today the ICI filed the attached comment letter to the Securities and Exchange Commission ("SEC") in response to its proposed rule to amend the securities settlement cycle. The proposal would amend Rule 15c6-1(a) under the Securities Exchange Act of 1934 ("Exchange Act") to shorten the standard settlement cycle for most broker-dealer transactions from three business days after the trade date ("T+3") to two business days after the trade date ("T+2").

Our letter express the support for shortening the settlement cycle to T+2. We explain the benefits of a shorter settlement cycle to institutional investors and the overall risk reduction benefits. We recommend that the SEC finalizes the rule as soon as possible, and adopts the industry suggested migration date of September, 5, 2017.

Martin A. Burns
Chief Industry Operations Officer

Ahmed Elghazaly
Director, Securities Operations

[Attachment](#)

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