

**MEMO# 24760**

December 2, 2010

# **SEC Updates Questions and Answers About Money Market Fund Reform and Form N-MFP**

[24760]

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TO: ACCOUNTING/TREASURERS COMMITTEE No. 15-10  
BROKER/DEALER ADVISORY COMMITTEE No. 59-10  
MONEY MARKET FUNDS ADVISORY COMMITTEE No. 65-10  
MUNICIPAL SECURITIES ADVISORY COMMITTEE No. 50-10  
OPERATIONS COMMITTEE No. 39-10  
SEC RULES MEMBERS No. 132-10  
SMALL FUNDS COMMITTEE No. 26-10  
TRANSFER AGENT ADVISORY COMMITTEE No. 81-10 RE: SEC UPDATES QUESTIONS AND  
ANSWERS ABOUT MONEY MARKET FUND REFORM AND FORM N-MFP

The staff of the SEC's Division of Investment Management has prepared responses to additional questions related to (1) money market fund reform (Rule 2a-7) [\[1\]](#) and (2) Form N-MFP for money market funds. [\[2\]](#)

## **Questions and Answers Relating to Rule 2a-7**

The staff has added a new question and answer (Question V.H.1) indicating that the final legal maturity date of a security for purposes of the website disclosure requirement in Rule 2a-7(c)(12)(ii)(F) should be the same date used to calculate the fund's weighted average life ("WAL").

## **Questions and Answers Relating to Form N-MFP**

The new questions and answers relating to Form N-MFP can be found in Sections I.B.1 and

II.E of the staff's Q&As. New Question I.B.1 concerns the requirement in Rule 30b1-7 that a fund's report of portfolio holdings on Form N-MFP be current as of the last business day of the previous month. It states that some funds have indicated that they compile the portfolio holdings information as of the last calendar day of the month, even if that day is on a Saturday, Sunday or holiday. The answer indicates that the staff will not object if, in these circumstances, a fund reports the portfolio holdings information on Form N-MFP current as of a day in the month on or after the last business day of the month.

Consistent with new Question V.H.1 above, a new question and answer under Section II.E indicates that a security's final legal maturity date for purposes of Item 36 of Form N-MFP should be the same date used to calculate the fund's WAL.

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**endnotes**

[1] See <http://www.sec.gov/divisions/investment/guidance/mmfreform-imqa.htm>.

[2] See <http://www.sec.gov/divisions/investment/guidance/formn-mfpqa.htm>.

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