

MEMO# 25020

March 10, 2011

SEC Notice to N-MFP Filers Regarding April Filings

[25020]

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TO: ACCOUNTING/TREASURERS MEMBERS No. 4-11
MONEY MARKET FUNDS ADVISORY COMMITTEE No. 15-11
MUNICIPAL SECURITIES ADVISORY COMMITTEE No. 15-11
SEC RULES MEMBERS No. 43-11 RE: SEC NOTICE TO N-MFP FILERS REGARDING APRIL FILINGS

The SEC recently issued the following <u>notice</u> to Form N-MFP filers regarding April monthend filings.

Notice to Form N-MFP Filers

As noted in the Form N-MFP FAQ's, rule 30b1-7 requires that the report of portfolio holdings on Form N-MFP be current as of the last business day of the previous month. Since 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 Commission staff stated that it would not object if 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.

Currently, EDGAR is programmed to accept only a report date of the Commission's last business day of the month, and EDGAR will suspend filings with a report date later than the Commission's last business day.

Until EDGAR is reprogrammed to allow for the inclusion of a report day later in the month than the Commission's last business day, the staff is directing filers to include in their N-MFP submissions a report date which is the last business day of the month for the Commission, even if their actual last business day is a day later in the month.

For April, the last business day of the month for the Commission is April 29, not Saturday April 30. If filers include in their Form N-MFP's a report date of April 30, EDGAR will suspend their N-MFP submission. We are instructing filers to use April 29 as the report date for April,

even if the information reported on the form is as of April 30.

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