

MEMO# 23815

September 23, 2009

SEC Creates Template for Money Market Fund Reporting of Portfolio Holdings

[23815]

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TO: ACCOUNTING/TREASURERS COMMITTEE No. 17-09
MONEY MARKET FUNDS ADVISORY COMMITTEE No. 38-09
MUNICIPAL SECURITIES ADVISORY COMMITTEE No. 44-09
SEC RULES MEMBERS No. 101-09
VARIABLE INSURANCE PRODUCTS ADVISORY COMMITTEE No. 17-09 RE: SEC CREATES TEMPLATE FOR MONEY MARKET FUND REPORTING OF PORTFOLIO HOLDINGS

As you know, the Securities and Exchange Commission has adopted an interim final temporary rule (Rule 30b1-6T) that requires a money market fund to report its portfolio holdings to the SEC under certain circumstances. [1]

Under the new rule, the SEC will receive information substantially similar to the information that certain money market funds reported to the SEC and Department of Treasury under the Treasury's Guarantee Program, which expired on Sept. 18, 2009. Rule 30b1-6T under the Investment Company Act of 1940 became effective Sept. 18, 2009 and will expire on Sept. 17, 2010.

In connection with the new reporting requirement, the SEC has created a template for submitting portfolio holdings in Microsoft Excel format, which can be found on their website at http://sec.gov/divisions/investment/guidance/30b1-6t.htm.

Associate Counsel

endnotes

[1] See Disclosure of Certain Money Market Fund Portfolio Holdings, SEC Release No. IC-28903 (September 18, 2009) ("Release"), available on the SEC's website at http://sec.gov/rules/final/2009/ic-28903.pdf.

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