

MEMO# 6083

July 27, 1994

SEC IMPLEMENTS FINANCIAL DATA SCHEDULE FOR ELECTRONIC FILERS; ISSUES GUIDANCE ON AVOIDING ERRORS IN EDGAR FILING PROCESS

July 27, 1994 TO: ACCOUNTING/TREASURERS COMMITTEE NO. 41-94 SEC RULES
COMMITTEE NO. 83-94 RE: SEC IMPLEMENTS FINANCIAL DATA SCHEDULE FOR ELECTRONIC
FILERS; ISSUES GUIDANCE ON AVOIDING ERRORS IN EDGAR FILING PROCESS

The SEC has issued a series of releases on the Electronic Data Gathering, Analysis, and Retrieval system (EDGAR). The first release (IC-20388) announces implementation of the financial data schedule for certain electronic filings starting September 1, 1994. The second release (IC- 20389) formally adopts an updated edition of the EDGAR Filer Manual (EDGAR Release 3.5). The third release (IC-20390) proposes minor technical changes to the rules governing electronic filing and also provides guidance on avoiding errors in the EDGAR filing process. Financial Data Schedule Implementation On February 23, 1993 the Commission adopted interim rules to implement mandated electronic filing on the EDGAR system including provisions requiring electronic filers to furnish financial data schedules. The financial data schedule consists of specified numbers taken from the fund's existing financial statements and schedules arranged in a specified format. The schedule will permit financial data to be recognized and captured by the EDGAR system for automated tabulation. Commission staff will use this information for screening purposes and to help examiners review filings. The financial data schedule provisions were initially to become effective on November 1, 1993. To provide additional time for system programming, the Commission delayed implementation of the financial data schedule. Release IC-20388 announces that registration statements, post-effective amendments, semi-annual and annual reports on Form N-SAR and certain proxy statements filed electronically on or after September 1, 1994, must include a financial data schedule. The EDGAR Filer Manual and EDGARLink version 3.5 support construction of the financial data schedule. - 2 - Technical Changes to Rules Governing Electronic Filing Most of the proposals contained in Release IC-20390 relate to Regulation S-T, which governs the preparation and submission of electronic filings to the Commission. Many of the proposed changes clarify language in the current requirements or make technical corrections to previously adopted rules. Several changes represent codification of staff rule interpretations. One proposal contained in IC-20390 relates to the statutory requirement to furnish the Commission with a paper copy of each electronic filing for a period of one year following a registrant's phase-in date. Under the proposal, new electronic filers would be required to provide the Commission with one paper copy of their first electronic filing only. Comments on IC-20390 should be received by the Commission no later than August 10,

1994. IC-20390 also provides staff guidance on common mistakes made by EDGAR filers and provides suggestions to help electronic filers avoid some of the more common errors associated with electronic filing. Topics addressed include: a) error checking, b) appropriate use of the tag, c) appropriate use of the tag, and d) filing fees. Gregory M. Smith Director - Operations/ Compliance & Fund Accounting Attachment

Copyright © by the Investment Company Institute. All rights reserved. Information may be abridged and therefore incomplete. Communications from the Institute do not constitute, and should not be considered a substitute for, legal advice.