MEMO# 11078

June 25, 1999

SURVEY OF POLICIES FOR PROCESSING AS-OF TRANSACTIONS

[11078] June 25, 1999 TO: ACCOUNTING/TREASURERS COMMITTEE No. 19-99 RE: SURVEY OF POLICIES FOR PROCESSING AS-OF TRANSACTIONS

Accounting Policy Subcommittee prepared the attached survey of policies for processing "as-of" transactions in fund shares. Delays or errors in processing shareholder transaction requests may cause a fund to honor the request at the net asset value on the date it was originally received. These as-of transactions may result in a gain or loss to the fund due to fluctuations in net asset value between the date the transaction request was originally received, and the date the transaction request was processed. The attached questionnaire is intended to survey policies for monitoring the impact of as-of transactions and standards for fund reimbursement. Please complete the attached questionnaire and return it to the Institute by July 30. Responses will be compiled by the Institute and released in aggregate form (i.e., no individual firm responses will be released separately). Survey results will be distributed to participating firms. If you have any questions please contact the undersigned at 202/326-5851 or smith@ici.org. Gregory M. Smith Director - Operations/ Compliance & Fund Accounting Attachment

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