

IMPORTANT NOTICE

National Securities Clearing Corporation



A# 6640
P&S # 6210
DATE: June 20, 2008
TO: ALL PARTICIPANTS

ATTENTION: MANAGER MUTUAL FUNDS OPERATIONS,
MANAGER DATA PROCESSING, MANAGER
CASHIERS, MANAGER P&S DEPARTMENT
FROM: WEALTH MANAGEMENT SERVICES – MUTUAL
FUNDS
SUBJECT: ENHANCEMENTS TO MUTUAL FUND PROFILE
SERVICE II (PROFILE SECURITY Database) FOR
DTCC WEBDIRECT AND MAINFRAME

As stated in Important Notice A#6614, P&S# 6184, dated May 14, 2008, **effective Monday, August 18, 2008** National Securities Clearing Corporation (NSCC) will be implementing enhancements to Mutual Fund Profile Service II (Profile Security database) for DTCC users. In addition, NSCC has created two reports which will aid fund companies as they review and validate their existing data on the Profile database.

In our on-going effort to position Profile Security database as the central database of fund rules-based and operational information, the following enhancements will be implemented.

New Reports Available Online For Funds to Validate Data Input – Effective Monday, June 30, 2008

- DTCC created two new validation reports that will enable participants to more easily identify data omission or entry errors that may have resulted from conversion data. Please note that all data fields now have edit capability and are required or conditionally required for input. The new Reports in Excel format are: “**Required Fields with No Data**” and “**Fields with Invalid Values**”.
- **Required Fields with No Data** – this report will list any required fields with blanks or nulls.
- **Fields with Invalid Values** – this report will list all fields that do not contain a valid value as defined in the data dictionary.

The reports will help the user make any necessary changes via the input screen. These reports have the added value of indicating where the invalid value resides on the database, i.e., at the default information levels or at the Security Issue ID level.

Funds may access their reports for their securities only. To request these reports online, first go to the left hand navigation bar, and under **Data Files**, click on **File Request**. The report names will appear. Click on the name of the report you would like to run. The reports will be available every hour from 8:00 AM to 8:00 PM (13 cycles). Please note that you may have to wait a short while until the report is ready to be downloaded. When the report is ready to be downloaded, go to **Reports**, click on **Downloadable Reports**, and make your selection.

Detailed instructions can also be found in **Appendix A** – “How to Use DTCC Validation Reports” – , and should be followed once you have downloaded the **Fields with Invalid Values** report.

In addition, for those users not familiar with Excel when downloading the report, please follow the instructions in **Appendix B** to format the reports using the autofit macro.

Reminder about Reports: The reports include identifiable issues only, and do not include data that may not accurately reflect prospectus rules. For example, if the prospectus states 90 days, but Profile Security reflects 60 days, this is not programmatically identifiable. It’s important that funds continue to review their data and make updates as changes occur to ensure it accurately reflects rules.

New AutoRoute IDs for Reports via DTCC WebDirect Screens Only

To receive the report files mentioned above, users can input their Report file request through DTCC WebDirect. New AutoRoute file IDs have been created for these new reports. Funds that currently utilize Profile Security database through DTCC WebDirect will automatically be set up by the Enterprise Service Center (ESC) with the new AutoRoute IDs below. New DTCC WebDirect users must contact their Relationship Manager for proper setup of these new AutoRoute IDs.

Environment	Name of File	AutoRoute ID
Production	Required Fields with No Data	02110391
PSE (Test region)	Required Fields with No Data	02980391
Production	Fields with Invalid Values	02110392
PSE (Test region)	Fields with Invalid Values	02980392

Enhanced WebDirect Online Screen and Mainframe Data Edits –Effective August 18, 2008

Based on the work of the ICI Profile II Edit Report Working Group, hard and soft edit criteria has been established. These edits will be implemented to ensure data is being entered correctly. If the new input does not meet the “hard edits”, web online users will receive an appropriate reject message on screen, while mainframe users will have their file transmission rejected with an appropriate reject code(s) for the specific record that did not meet the edit criteria. Please refer to **Appendix C** for the hard edit rules.

Reminder: New Fund Users of Profile Security Must Authorize Release of Their Data

Funds that are populating Profile Security database for the first time are reminded that once all required data has been populated and validated, an authorizing email must be sent to their Wealth

Management Services Relationship Manager and a copy to rgribben@dtcc.com. The email should confirm (a) data input is complete, (b) the data has been reviewed for accuracy and (c) the data can be released as output to firms. DTCC will confirm when the data is released.

Input and Output Cutoff Time

DTCC's processing cutoff time for the current day's output will be 8:15 PM ET other than noted. All changes input before this time will be on the database and sent in that day's output Autoroute file. All changes that occur after 8:15 PM ET will be on the database but sent out in following day's output Autoroute file.

Additional Training Simulations for Funds on Data Input, and for Funds and Firms on Downloading Files and Reports

In addition to the current online training simulations for the "Hierarchy Management Transactions" screens listed below,

- Create, Update, and Delete Share Class Names
- Create, Update, and Delete Fund Portfolio Names
- Update and Delete Security Issue IDs

DTCC has also created new online training simulations to instruct fund input users on populating the "Data Management Transactions" screens. In addition users can access a simulation to learn how to download user files. Then new simulations instruct users on:

- Adding New Information to Profile
- Updating Information in Profile
- Viewing Information in Profile and
- Downloading User Files

DTCC recommends that all users of the Profile Security database, particularly input users, review all simulations to obtain a better understanding of how the relational hierarchy database works. These simulations are available on the Wealth Management Services Web site and can be found at <http://www.dtcc.com/products/wealthmgmt> under the **Participants' Section, User Manuals, and Profile Security Issue Training Simulations.**

Testing

Effective Thursday, July 24, 2008, testing of the new record layouts and Web screen functionality will be accommodated in the Participant Services Environment (PSE) region. Participants are advised to test. Participants wishing to test must contact the Enterprise Service Center (ESC) by calling the NSCC Production Support Hotline at 212-855-1144, option 5, option 2. To ensure proper setup for the PSE region, we recommend that you send ESC a notice at least three days prior testing.

Documentation

The Profile Security DTCC WebDirect User Guide, Technical Manual, Best Practices Guide, and Data Dictionary will be updated and made available to participants in July on the Wealth Management Services Web site at <http://www.dtcc.com>.

Mutual Fund Profile Service Webshow

NSCC will be hosting a Web show on the new Profile Security database enhancements and other MFPS information on June 25. Details will be emailed to participants closer to the event.

Any questions or concerns regarding this Important Notice can be directed to Mutual Fund Marketing at 212-855-8877, your WMS Relationship Manager, or the undersigned.

Rita A. Gribben
Director/Product Management
DTCC Mutual Fund Services
212-855-5677

Appendix A

Instructions on How to use DTCC Validation Reports

Name of Report: Fields with Invalid Values

I Introduction

DTCC, in conjunction with the Investment Company Institute (ICI), FINRA, fund families and broker/dealers has spent the last several months reviewing the accuracy of the data that has been input into the Profile Security database. As a result of our findings, we are taking measures to reduce the potential of future errors by building a more robust front-end system. We are also creating more user-friendly reports that will enable both funds and firms to more easily identify data entry errors, errors of omission, and to ensure that their data matches the data provided in the fund prospectus.

The first report, in a series of reports we plan to produce, consists of data that has either (a) been entered incorrectly or (b) converted from the original version of MF Profile with values that are no longer valid (see Data Dictionary rules).

We ask that you review these items and (a) confirm our findings, (b) fix the erroneous entries if they are indeed wrong, and (c) identify for us any items that you feel are correct, based on the funds rules and the Data Dictionary parameters.

The following is a brief description of how to use this report:

II. How to Use the “Report – Fields with Invalid Values” to Review, Validate, and/or Correct Data

1. To understand why a value or default value appears on the report, please refer to the Data Dictionary that contains DTCC System Edits and Default Values (Column L).
2. The Report is sorted first by:
 - a. Management Company level and then by its logical groupings
 - b. Share Class Level and then by its logical groupings
 - c. Fund Portfolio level and then by its logical groupings
 - d. Security Issue ID
3. DTCC’s report has the added value of indicating where the invalid value may reside on the database, i.e., at the default information levels or at the Security issue ID level.

IMPORTANT NOTE: The Report is designed so that funds can review and correct their default level invalid data first, by starting at the Management Company level and working their way down to the Share Class level, the Fund Portfolio level, and finally the Security Issue ID level.

If a fund goes directly to the Update Security Issue ID level, and updates invalid data at this particular level, there is a strong possibility that the data will only be corrected at the Security Issue ID level, and the default data from higher levels will still contain invalid values. This will cause the Security Issue ID level to override values/ fields.

4. The report columns are in the following order:
 - a. FIELD NAME
 - b. MGT. CO # - NSCC participant number
 - c. MGT. CO. NAME
 - d. SHARE CLASS
 - e. FUND PORTFOLIO
 - f. SECURITY ID
 - g. CURRENT VALUE
 - h. AVAILALBE VALUES
 - i. CURENT/FUTURE
 - j. TAB
5. The reports were developed to be used by the User with the screens. The Report flows with the screens. **Start at the very first row and work your way down the spreadsheet.**
6. Possible invalid values at the Default levels will appear first on the report. Read across the row from left to right. The TAB column tells you at which level and logical grouping contains the invalid value.
7. If the MGT CO is listed (and no Share Class, no Fund Portfolio, and no Security ID appear), then go to the Update Management Company level. The TAB column will direct you to the level and logical grouping where the FIELD NAME and its possible invalid CURRENT VALUE reside.
8. If the MGT CO and SHARE CLASS are listed (and no Fund Portfolio, and no Security ID appear), then go to the Update Share Class level. The TAB column (level and logical grouping) will direct you to the level and logical grouping where the FIELD NAME and its possible invalid CURRENT VALUE reside.
9. If the MGT CO. and FUND PORTFOLIO are listed (and no Share Class and no Security ID appear), then go to the Update Fund Portfolio level. The TAB column will direct you to the level and logical grouping where the FIELD NAME and its possible invalid CURRENT VALUE reside.
10. If the MGT CO and SHARE CLASS and FUND PORTFOLIO and SECURITY ID are listed, then go to the Update Security issue ID level. The TAB column directs you to the level and logical grouping where the FIELD NAME and its possible invalid CURRENT VALUE resides..

EXAMPLES:

- a. If a row contains the MGT CO and the SHARE CLASS, but nothing appears in the FUND PORTFOLIO or the SECURITY ID columns, then go to the Update Share Class level. The TAB column may say “GENERAL PROFILE / SHARE CLASS LEVEL,” which means the possible current invalid value shown for the FIELD NAME listed can be found at the Share Class default level for the SHARE CLASS name listed at the General Profile tab.

- b. If a row contains the MGT CO, SHARE CLASS NAME, FUND PORTFOLIO NAME, and a specific SECURITY ID, then go to the Update Security Issue ID level, retrieve that Security Issue ID, and review/change the value of the field at the logical grouping/ default level as designated in the TAB column.

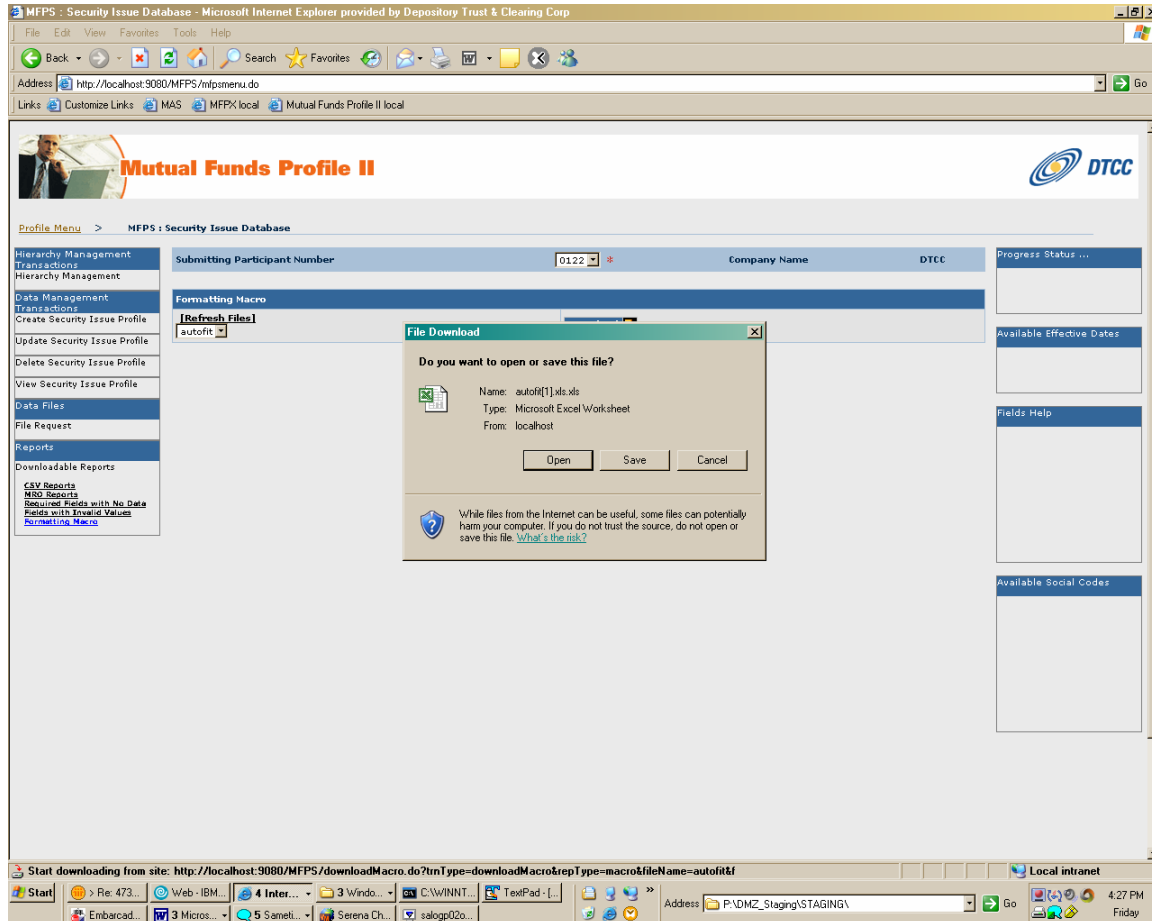
Appendix B

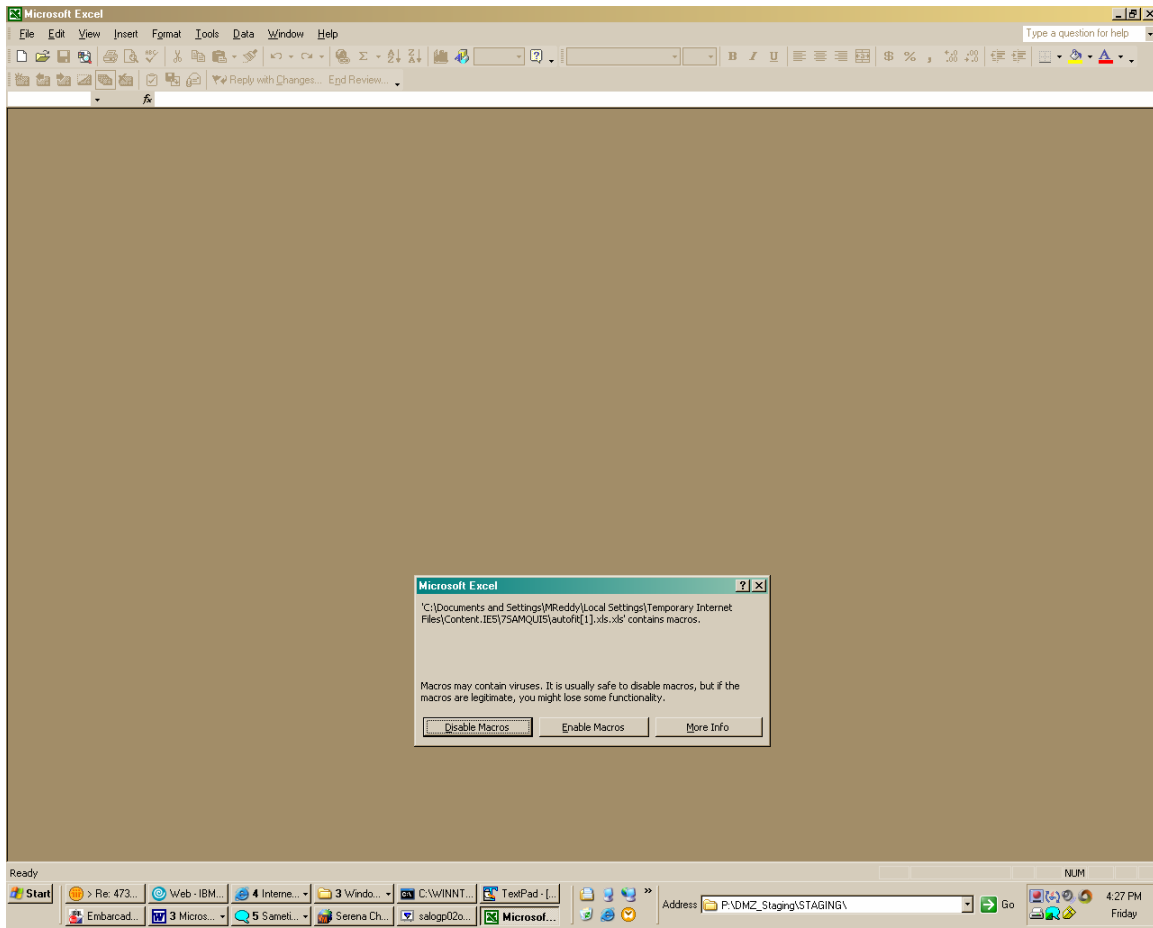
Formatting the Excel Documents Using the Auto fit Macro

Download and open the macro.

Click Enable Macros if prompted.

Leave macro open in the Background, (This can stay open in the background if you will be formatting multiple reports.)





Now open any of the desired Excel reports and press “Ctrl + m”.

Appendix C

The following are the new edits going into production on August 18th.

Field Name	Record Type	Level	DTCC Edit
1. Child Maturation Age	029	Mgmt Co	If Link-by-Child-Code = '0' (No) then Child Maturation Age must be spaces
2. Load Type Code	020 –General Profile	Share Class	<p>If Load Type Code = '0' (Front-End Load) then Breakpoint Rules Apply Code must be '1' (Yes).</p> <p>If Load Type Code = '1' (Back-End Load), then CDSC Rules Apply Code must be '1' (Yes).</p> <p>If Load Type Code = '2' (Level Load), then CDSC Rules Apply Code must be '1' (Yes).</p> <p>If Load Type Code = '3' (Hybrid), then CDSC Rules Apply Code must be '1' (Yes).</p> <p>If Load Type Code = '4' (No Load), then CDSC Rules Apply Code must be '0' (No).</p> <p>If Load Type Code = '4' (No Load), then Breakpoint Rules Apply Code must be '0' (No).</p>
3. NAV Repurchase CDSC Reimbursement Code	020 –General Profile	Share Class	If CDSC Rules Apply Code = 0 (No), then NAV Repurchase CDSC Reimbursement Code must be 0 – Not applicable
4. Maximum Purchase Amount	020 –General Profile	Share Class	<ol style="list-style-type: none"> 1. Maximum Purchase Amount must be greater than 0. 2. Maximum Purchase Amount must be less than or equal to Maximum Account Value 3. Maximum Purchase Amount must be greater than or equal to any of the following: Minimum Initial Purchase Amount, Minimum Subsequent Purchase Amount, Minimum Periodic/Systematic Investment Purchase Amount, Minimum IRA/Roth IRA Initial Purchase Amount, Minimum IRA/Roth IRA Subsequent Purchase Amount, Minimum Coverdell IRA Initial Purchase Amount, Minimum Coverdell IRA Subsequent Purchase Amount, Minimum Wrap Initial Purchase Amount, Minimum Wrap Subsequent Purchase Amount, Minimum Qualified Plans Initial Purchase Amount, Minimum Qualified Plans Subsequent Purchase Amount
5. Minimum Initial Purchase Amount	020 –General Profile	Share Class	<ol style="list-style-type: none"> 1. Minimum Initial Purchase Amount must be less than or equal to Maximum Purchase Amount 2. Minimum Initial Purchase Amount must be less than or equal to Maximum Account Value
6. Minimum Subsequent Purchase Amount	020 –General Profile	Share Class	<ol style="list-style-type: none"> 1. Minimum Subsequent Purchase Amount must be less than or equal to Minimum Initial Purchase Amount 2. Minimum Subsequent Purchase Amount must be less than or equal to Maximum Purchase Amount 3. Minimum Subsequent Purchase Amount must be less than or equal to Maximum Account Value
7. Minimum Periodic/Systematic Investment Purchase Amount	020 –General Profile	Share Class	<ol style="list-style-type: none"> 1. Minimum Periodic/Systematic Investment Purchase Amount must be less than or equal to Maximum Purchase Amount 2. Minimum Periodic/Systematic Investment Purchase Amount must be less than or equal to Maximum Account Value
8. Minimum IRA/Roth IRA Initial Purchase Amount	020 –General Profile	Share Class	<ol style="list-style-type: none"> 1. Minimum IRA/Roth IRA Initial Purchase Amount must be greater than or equal to Minimum IRA/Roth IRA Subsequent Purchase Amount 2. Minimum IRA/Roth IRA Initial Purchase Amount must be less than or equal to any of the

			following fields: Maximum Purchase Amount and Maximum Account Value
9. Minimum IRA/Roth IRA Subsequent Purchase Amount	020 –General Profile	Share Class	<ol style="list-style-type: none"> 1. Minimum IRA/Roth IRA Subsequent Purchase Amount must be less than or equal to Minimum IRA/Roth IRA Initial Purchase Amount 2. Minimum IRA/Roth IRA Subsequent Purchase Amount must be less than or equal to any of the following fields: Maximum Purchase Amount and Maximum Account Value
10. Minimum Coverdell IRA Purchase Amount	020 –General Profile	Share Class	<ol style="list-style-type: none"> 1. Minimum Coverdell IRA Purchase Amount must be greater than or equal to Minimum Coverdell IRA Subsequent Purchase Amount. 2. Minimum Coverdell IRA Purchase Amount must be less than or equal to any of the following fields: Maximum Purchase Amount and Maximum Account Value
11. Minimum Coverdell IRA Subsequent Purchase Amount	020 –General Profile	Share Class	<ol style="list-style-type: none"> 1. Minimum Coverdell IRA Subsequent Purchase Amount must be less than or equal to Minimum Coverdell IRA Purchase Amount 2. Minimum Coverdell IRA Subsequent Purchase Amount must be less than or equal to any of the following fields: Maximum Purchase Amount and Maximum Account Value
12. Minimum Wrap Initial Purchase Amount	020 –General Profile	Share Class	<ol style="list-style-type: none"> 1. Minimum Wrap Initial Purchase Amount must be greater than or equal to Minimum Wrap Subsequent Purchase Amount 2. Minimum Wrap Initial Purchase Amount must be less than or equal to any of the following fields: Maximum Purchase Amount and Maximum Account Value
13. Minimum Wrap Subsequent Purchase Amount	020 –General Profile	Share Class	<ol style="list-style-type: none"> 1. Minimum Wrap Subsequent Purchase Amount must be less than or equal to Minimum Wrap Initial Purchase Amount 2. Minimum Wrap Subsequent Purchase Amount must be less than or equal to any of the following fields: Maximum Purchase Amount and Maximum Account Value
14. Minimum Qualified Plans Initial Purchase Amount	020 –General Profile	Share Class	<ol style="list-style-type: none"> 1. Minimum Qualified Plans Initial Purchase Amount must be greater than or equal to Minimum Qualified Plans Subsequent Purchase Amount 2. Minimum Qualified Plans Initial Purchase Amount must be less than or equal to any of the following fields: Maximum Purchase Amount and Maximum Account Value
15. Minimum Qualified Plans Subsequent Purchase Amount	020 –General Profile	Share Class	<ol style="list-style-type: none"> 1. Minimum Qualified Plans Subsequent Purchase Amount must be less than or equal to Minimum Qualified Plans Initial Purchase Amount 2. Minimum Qualified Plans Subsequent Purchase Amount must be less than or equal to any of the following fields: Maximum Purchase Amount and Maximum Account Value
16. Maximum Account Value	020 –General Profile	Share Class	<ol style="list-style-type: none"> 1. Maximum Account Value must be greater than 0. 2. Maximum Account Value must be greater than or equal to any of the following: Maximum Purchase Amount, Minimum Initial Purchase Amount, Minimum Subsequent Purchase Amount, Minimum Periodic/Systematic investment Purchase Amount, Minimum IRA/Roth IRA Initial Purchase Amount, Minimum IRA/Roth IRA Subsequent Purchase Amount, Minimum Coverdell IRA Initial Purchase Amount, Minimum Coverdell IRA Subsequent Purchase Amount, Minimum Wrap Initial Purchase Amount, Minimum Wrap Subsequent Purchase Amount, Minimum Qualified Plans Initial Purchase Amount, Minimum Qualified Plans Subsequent Purchase Amount
17. Number of Eligible Participants Minimum	025- Social Codes	Share Class	<ol style="list-style-type: none"> 1. Number of Eligible Participants Minimum must be greater than 0. 2. Number of Eligible Participants Minimum must be greater than or equal to Number of Active Participants Minimum

18. Number of Active Participants Minimum	025- Social Codes	Share Class	<p>1. Number of Active Participants Minimum must be greater then 0.</p> <p>2. Number of Active Participants Minimum must be less than or equal to Number of Eligible Participants Minimum</p>
19. Minimum Asset Size for Eligibility	025- Social Codes	Share Class	1. Minimum Asset Size for Eligibility must be less than or equal to Maximum Asset Size for Eligibility
20. Maximum Asset Size for Eligibility	025- Social Codes	Share Class	1. Maximum Asset Size for Eligibility must be greater than or equal to Minimum Asset Size for Eligibility
21. CDSC Death Waiver Code	022 - CDSC	Share Class	<p>If CDSC Death Waiver Code is set to No (0) then, CDSC Death Waiver Time Period must be blank or 0</p> <p>IF CDSC Death Waiver Code is set to Yes (1) then, CDSC Death Waiver Time Period must be greater then 0.</p>
22. CDSC Qualified Distribution Waiver Code	022 - CDSC	Share Class	<p>If CDSC Qualified Distribution Waiver Code is set to No (0) then, CDSC Qualified Distribution Waiver Age Period must be blank or 0</p> <p>If CDSC Qualified Distribution Waiver Code is set to Yes (1) then, CDSC Qualified Distribution Waiver Age Period must be greater than 0</p>
23. CDSC Lower Limit	022 - CDSC	Share Class	CDSC Lower Limit must be less then CDSC Upper Limit
24. CDSC Upper Limit	022 - CDSC	Share Class	<p>1 CDSC Upper Limit must be greater than CDSC Lower Limit</p> <p>2. CDSC Upper Limit must be less than next CDSC Lower Limit</p>
25. CDSC Required Minimum Distribution Amount Code	022 - CDSC	Share Class	<p>1. CDSC Required Minimum Distribution Amount Code must be blank when, CDSC Qualified Distribution Waiver Code is No (0).</p> <p>2. CDSC Required Minimum Distribution Amount Code must be set to '0' or '1' if, CDSC Qualified Distribution Waiver Code is Yes (1).</p>
26. Breakpoint Minimum Account Value	023 - Breakpoint	Share Class	1 Breakpoint Minimum Account Value must be less than Breakpoint Maximum Account Value
27. Breakpoint Maximum Account Value	023 - Breakpoint	Share Class	<p>1. Breakpoint Maximum Account Value must be greater than Breakpoint Minimum Account Value</p> <p>2. Breakpoint Maximum Account Value must be less than next Breakpoint Minimum Account Value</p>
28. Breakpoint Dealer Concession Rate	023 - Breakpoint	Share Class	Breakpoint Dealer Concession Rate must be greater than or equal to Breakpoint Underwriter Rate
29. Product Type Code	020 –General Profile	Portfolio	<p>1 If Product Type Code = 02 (Money Market Mutual Fund) then,</p> <p>a. Dividend Type Code must not be equal to 0 (Record Date)</p> <p>b. Investment Class Code must be Taxable Government Money Market Fund (30) or Taxable Non-Government Money Market Fund (31) or Tax-Exempt National Money Market Fund (32) or Tax-Exempt State Money Market Fund (33)</p>
30. Offering Type Code	020 –General Profile	Portfolio	<p>1. If Offering Type Code = 1 (Selling Period) then, Selling Period Close Date can't be 99991231.</p> <p>2. If Offering Type Code = 0 (Continuous) then, Selling Period Close Date must be 99991231.</p>
31. Date of Most Recent Prospectus Supplement	020 –General Profile	Portfolio	Date of Most Recent Prospectus Supplement must be greater than or equal to Date of Current Prospectus; and allow 99991231 as a valid date.
32. Dividend Type Code	020 –General Profile	Portfolio	If Dividend Type Code = 0 (Record Date) then, the following fields must be blank:

			<ul style="list-style-type: none"> • Dividend Accrual Purchase Start Date Code • Dividend Accrual Redemption Stop Date Code • Dividend Accrual Exchange Start Date Code • Dividend Accrual Exchange Stop Date Code • Dividend Accrual Full Transfer Start Date Code • Dividend Accrual Partial Transfer Start Date Code • Dividend Accrual Transfer Stop Date Code • Dividend Accrual Bulk Rate Method Code • Dividend Accrual Month-End Bulk Rate Method Code
33. Dividend Frequency Code	020 –General Profile	Portfolio	Dividend Frequency Code must be blank when Dividend Type Code is Fund Does Not Pay Dividends (3)
34. STR Qualified Distribution Waiver Code	026 - STR	Portfolio	<p>1 If STR Qualified Distribution Waiver Code = 0 (No) then, STR Qualified Distribution Waiver Age must be blank or 0</p> <p>2. If STR Qualified Distribution Waiver Code = 1 (Yes) then, STR Qualified Distribution Waiver Age must be greater then 0</p>