



CELEBRATING 25 YEARS

Income Research & Management (“IR+M”) is a fixed income asset management firm with approximately \$34 billion in assets under management as of August 31<sup>st</sup>, 2012. IR+M manages portfolios on behalf of individual and institutional investors including private and public pension plans, insurance entities, healthcare providers, universities, foundations, and corporations and has been an active participant in the U.S. credit markets since its inception in 1987.

We are writing in response to FINRA’s request for comment on TRACE dissemination issues. Comments are as follows:

### **Dissemination Caps for Investment Grade and Non-Investment Grade Debt Securities**

1. What would be the impact of raising the dissemination caps for:
  - a. investment grade TRACE-eligible securities transactions to \$10 million, \$15 million, \$20 million or higher; and
  - b. non-investment grade TRACE-eligible securities transactions to \$5 million, \$10 million, \$20 million or higher?

*A \$5-\$10 million cap increase for investment grade securities would allow for better overall market volume reporting as well as increase transparency into the pricing of standard large blocks (~\$10 million). Similarly, a cap increase for non-investment grade to \$5 million would allow for a more sufficient analysis of the market relative to the current \$1 million cap.*

2. Should FINRA set a dissemination cap applicable solely to agency debt securities in light of the larger size of many transactions in such securities?
  - a. If so, should it be set at \$25 million, \$50 million, \$100 million or higher?

*Yes - \$50 million*

3. Should there continue to be different dissemination caps for investment grade and non-investment grade debt securities?

*Yes*

4. Should the dissemination caps for investment grade and non-investment grade debt securities be eliminated entirely?

*No – An elimination of dissemination caps would likely result in less capital committed by broker/dealers as trading margins would likely fall.*

5. Would the information available as a result of higher dissemination caps allow broker/dealers and institutional investors to better value positions?

*Yes, marginally*

6. Could alternative ways of determining dissemination caps—for example, by dollar value of transaction rather than par value—provide meaningful trade volume exposure while still limiting the transaction sizes displayed through the caps?

*More information is preferable to less though there is likely diminishing marginal utility as stated in the response to point #4.*

### **Dissemination Caps for TBA Transactions**

1. Should there be a dissemination cap for TBA transactions?
  - a. If yes, are the levels appropriate or should higher or lower caps be considered?

*Yes - \$250 million. A \$250 million cap would cover ~70% of the market which is consistent with our desires expressed above.*

### **Rule 144A Transactions**

1. Should Rule 144A transactions—private re-sales of securities to QIBs—be subject to dissemination?

*Yes*

2. If yes, should Rule 144A transactions be subject to dissemination in the same manner as other disseminated transactions in TRACE-eligible securities?
  - a. If yes, should they be disseminated subject to a dissemination cap?
  - b. If yes, what is the appropriate size (volume) at which to set the dissemination cap?

*Would prefer that dissemination mirrored that of comparable non 144A securities.*

### **Bill O'Neill, CFA**

Sr. Portfolio Manager

INCOME RESEARCH + MANAGEMENT  
100 FEDERAL STREET, 33RD FLOOR, BOSTON, MA 02110  
PHONE (617) 330-9333 - FAX (617) 330-9222  
[www.incomeresearch.com](http://www.incomeresearch.com)



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