

**INTERPRETATION
MEMO**Number 79-4
April 30, 1979SUBJECT: Interpretations of SEC Rule 15c3-1, 15c3-3 and NYSE Rule 321

The accompanying Handbook material includes clarifications and modifications of previously issued Handbook interpretations as well as various new interpretations through March 31, 1979.

The reference numbers of the clarified, modified and new interpretations are as follows:

<u>Topic</u>	<u>SEC Rule 15c3-1 Interpretation</u>	<u>Page</u>
Aggregate Indebtedness		
Intercompany Accounts with Subsidiaries	(c)(1)/09	118
Fails to Receive Continuous Net Settlement (CNS)		
Balances	(c)(1)(iii)/01	120
Net Worth and Adjustments		
Discretionary Liabilities	(c)(2)/02	126
Deductions		
Reconciliation Differences	(c)(2)(iv)/021	136, 136-2, 136-3
Cash Surrender Value - "Split Dollar"		
Life Insurance Policy	(c)(2)(iv)/05	137
Unsecured and Partly Secured Receivables		
Repurchase Agreements	(c)(2)(iv)(B)/04	139-140
Certain Receivables		
Intercompany Accounts with Guaranteed Subsidiaries	(c)(2)(iv)(C)/07	142
Haircuts and Undue Concentra- tion Charges		
Government Securities		
Quasi-agency Securities	(c)(2)(vi)(A)/01	149
Securities with a Limited Market		
Convertible Preferred Stock	(c)(2)(vi)(K)/01	158
Undue Concentration		
Exemptions	(c)(2)(vi)(M)/01	160
Secured Demand Note Collateral	(c)(2)(vi)(M)/06	163

* * * *

Filing Instructions

Changes through March 31, 1979

SEC Rule 15c3-1

<u>Remove Old Pages</u>	<u>Insert New Pages</u>	<u>Remove Old Pages</u>	<u>Insert New Pages</u>
116 - 120	116 - 121	166 - 169	166 - 169
126 - 127	126 - 127	171 - 173	171 - 173
136 - 140	136 - 140	176 - 177	176 - 177
142 - 143	142 - 143	186 - 187	186 - 187
149	149 - 150	189	189
156 - 163	156 - 163	221 - 225	221 - 225
		235	235
		242 - 244	242 - 244

Index

9001 - 9013 9001 - 9013

SEC Rule 15c3-3

1381 - 1386 1381 - 1386

NYSE Rule 321

3220 - 3221 3220 - 3225