

**INTERPRETATION
MEMO**

Number 79-9

November 30, 1979

Subject: Interim Update To Rule 15c3-1 and 17a-13,
Added Interpretation

The accompanying interpretation relating to quarterly security counts under Rule 17a-13, when performed by outside auditors, are added to the Interpretation Handbook. Both are identical. One is added to Rule 15c3-1 for the portion dealing with capital treatment of securities differences. The other to 17a-13 for the portion applicable to count and recording requirements.

Filing Instructions

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SEC Rule 15c3-1	144-145	144-145
SEC Rule 17a-13	--	2500

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Index revisions for the interpretations will be made with the next general update.