Interpretation Memo

Member Firm Regulation



20 Broad Street New York, NY 10005

Number 88-20 November 30, 1988

Please Route to Financial and Operations Officer/Partner and Compliance and Margin Departments

To: Members, Member Organizations and Handbook Subscribers

Subject: Update of Interpretation Handbook for SEC Rule 15c3-1 and 15c3-3

The accompanying updated handbook pages are being distributed as replacements for existing pages. Included are several interpretations which have not been previously available and the following should be carefully reviewed before insertion into the handbook.

SEC Rule 15c3-1

Page 267 (c)(11)(i)/04 The Ohio Dealer Data Service, Inc. is not recognized as an established securities market nor as an inter-

dealer quotation system.

273 (d)/031 A limited partner subordination may be included as equity in the debt-equity determination.

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SEC Rule 15c3-3

Page 541 (d)(2)/01	Revised interpretation concerning aged fails to receive of foreign issued, foreign settled securities.
Page 562 (m)/05	Buy-in required when securities to be received under a employee stock option plan are sold and not received within 15 business days.
Page 562 (m)/06	Alternative to 10 day buy-in require- ment on foreign-issued foreign settled securities.

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