Interpretation Memo

Member Firm Regulation



20 Broad Street New York, NY 10005

Number 90-1 February 14, 1990

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 RULES 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.

Rule 15c3-1

Page & Reference Subject

237,(c)(2)(ix)/07 Treatment of ACATS fails to deliver.

Remove old pages 237-238 and insert new pages 237-238.

Rule 15c3-3

516,(b)(4)(i)(A)/01 Requirement to obtain written agreement regarding hold

in custody repurchase transaction.

542,(d)(2)/03 Treatment of ACATS fails to receive.

545,(e)(1)/05 Conditions for deposit of qualified securities into

special reserve bank account.

Remove Pages Add Pages

515-517 515-518 539-546 539-546

RETAIN ALL INTERPRETATION/INFORMATION MEMOS FOR FUTURE REFERENCE.

3760L