

Summary of Money Market Fund Regulatory Amendments, February 23, 2010

PROPOSAL	DESCRIPTION OF NEW OR AMENDED RULE	CHANGE FROM CURRENT RULE	COMPLIANCE DATES
<p>Quality Amended Rule: 2a-7(a)(12) Amended Rule: 2a-7(c)(4)(i)(C) Amended Rule: 2a-7(c)(3)(ii)</p>	<ul style="list-style-type: none"> • An asset-backed security (“ABS”) is no longer required to be rated to be considered an “eligible security.” • Money funds may invest up to 3% in “second-tier” securities. • Money funds may invest no more than 0.5% in any second-tier security of any one issuer. • Maximum maturity of any second-tier security is 45 days. 	<ul style="list-style-type: none"> • Only rated ABSs were eligible. • Money funds previously could invest up to 5% in “second-tier” securities. • Money funds previously could invest no more than greater of 1% or \$1 million in any second-tier security of any one issuer. • Maximum maturity of any second-tier security was 397 days. 	<p>May 28, 2010</p>
<p>Ratings Agencies Amended Rule: 2a-7(a)(11)</p>	<ul style="list-style-type: none"> • Boards must designate 4 nationally recognized statistical rating organizations (“NRSROs”). • Boards must determine annually that each designated NRSRO’s ratings are reliable. • A money fund must disclose its designated NRSROs in its statement of additional information (“SAI”). 	<p>No similar provision.</p>	<p>SAI disclosure required no later than December 31, 2010</p>
<p>Maturity New and Amended Rule: 2a-7(c)(2)(ii) 2a-7(c)(2)(iii) 2a-7(d)(1)</p>	<ul style="list-style-type: none"> • Imposes a 60-day weighted average maturity limit. • Limits the weighted average life of portfolio securities to 120 days. • Interest rates on variable-rate Government securities must be readjusted no less frequently than every 397 days. 	<ul style="list-style-type: none"> • Currently imposes a 90-day average maturity limit. • No similar provision. • Currently, penny-rounding money funds may acquire Government securities with remaining maturities (or interest reset dates) of up to 762 days. 	<p>June 30, 2010 June 30, 2010 June 30, 2010</p>

PROPOSAL	DESCRIPTION OF NEW OR AMENDED RULE	CHANGE FROM CURRENT RULE	COMPLIANCE DATES
<p>Liquidity New Rule: 2a-7(c)(5)</p> <p>2a-7(c)(5)(i)</p> <p>2a-7(c)(5)(ii)</p> <p>2a-7(c)(5)(iii)</p>	<ul style="list-style-type: none"> • Money funds must hold highly liquid securities sufficient to meet reasonably foreseeable redemptions and any commitments made to shareholders. • SEC expects money funds to adopt policies to ensure the foregoing. • Prohibits money funds from acquiring securities that are illiquid if after they are acquired the money fund would have invested more than 5% of its total assets in illiquid securities. • Exempts tax-exempt funds from the minimum daily liquidity requirements. <p>Each taxable money fund must invest at least 10% of its assets in cash, U.S. Treasury securities, or securities that can provide daily liquidity.</p> <p>All money funds are required to hold at least 30% of total assets in weekly liquid assets.</p>	<p>No similar provision.</p> <p>No similar provision.</p> <p>No similar provision.</p> <p>No similar provision.</p>	<p>May 28, 2010</p> <p>May 28, 2010</p> <p>May 28, 2010</p> <p>May 28, 2010</p>
<p>Stress Testing Amended Rule: 2a-7(c)(10)(v)(A)</p>	<p>Money funds using amortized cost method must adopt periodic stress testing procedures.</p>	<p>No similar provision.</p>	<p>May 28, 2010</p>
<p>Repurchase Agreements New and Amended Rule: 2a-7(a)(5)</p> <p>2a-7(c)(4)(ii)(A)</p>	<p>Money funds would be able to adopt “look-through” treatment only with respect to repos collateralized by cash or Government securities.</p> <p>Money funds must evaluate counterparty creditworthiness, regardless of whether repo is fully collateralized.</p>	<p>Currently, a fund may look through repos collateralized with cash, Government securities, <i>and other first-tier securities.</i></p> <p>No similar provision.</p>	<p>May 28, 2010</p> <p>May 28, 2010</p>
<p>Public Holdings Disclosure Amended Rule: 2a-7(c)(12)</p>	<p>Requires monthly holdings disclosure on fund website.</p>	<p>No similar provision.</p>	<p>October 7, 2010</p>

PROPOSAL	DESCRIPTION OF NEW OR AMENDED RULE	CHANGE FROM CURRENT RULE	COMPLIANCE DATES
<p>Monthly Filing of Holding Reports New Rule: 30b1-7</p>	<p>Requires monthly SEC filing of detailed holdings information on new Form N-MFP. Funds must continue to file first- and third-quarter portfolio reports to SEC on Form N-Q and file annual and semi-annual shareholder reports on Form N-CSR.</p>	<p>Currently, funds are <u>only</u> required to file first- and third- quarter portfolio reports to the SEC on Form N-Q and file annual and semi-annual shareholder reports on Form N-CSR</p>	<p>December 7, 2010</p>
<p>Transaction Processing Amended Rule: 2a-7(c)(13)</p>	<p>Funds must have the operational capacity to “break a buck” and continue to process transactions in an orderly manner at prices other than stable value NAV.</p>	<p>No similar provision.</p>	<p>October 31, 2011</p>
<p>Suspension of Redemptions New Rule: 22e-3</p>	<ul style="list-style-type: none"> • Funds may suspend redemptions upon breaking a buck in order to liquidate in an orderly manner. • The SEC may rescind or modify the relief provided by the rule. 	<p>Replaces temporary Rule 22e-3T, which provided a similar exemption under the now-expired Treasury Guarantee Program.</p>	<p>May 5, 2010</p>
<p>Affiliated Transactions Amended Rule: 17a-9</p>	<ul style="list-style-type: none"> • Permits affiliate to buy a security that has defaulted, even though the security continues to be an eligible security. • The affiliate must promptly remit to the fund any profit realized from a later sale. 	<p>Currently, an affiliate may only purchase a security that is no longer an eligible security.</p>	<p>May 5, 2010</p>