SUNGARD®

September 13, 2013

Ms. Elizabeth M. Murphy
Secretary
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549-1090

Re: File No. S7-03-13: Release No. 33-9408;
Money Market Fund Reform; Amendments to Form PF

Dear Ms. Murphy:

SunGard Institutional Brokerage Inc. ("SIBI") appreciates the opportunity to comment on the Commission's recent Release proposing two alternatives for amending the rules that govern money market mutual funds (the "Proposed MMF Amendments").[1]

SIBI, an SEC-registered broker-dealer and FINRA member, is a subsidiary of SunGard Data Systems Inc. ("SunGard"). For over ten years, SIBI has operated the SGN Short-Term Cash Management Portal ("STCM Portal"), a money market fund ("MMF") portal that enables our customers—treasury managers at corporations, insurance companies, hedge funds, public utilities, governments, and universities—to research, analyze, and electronically transmit trades to hundreds of MMFs through a single connection. SIBI's non-regulated SunGard affiliates also offer a suite of liquidity management tools for corporate treasury functions, streamlined payment processing solutions, and trust accounting platforms. Through its STCM Portal, SIBI today helps its corporate treasury customers manage over $120 billion of MMF assets.

The SunGard Customer Survey

Because we and our customers have found MMFs, under the Commission's existing rules, to be highly-efficient short-term investment and cash management vehicles, we have an interest in assessing the potential impact of the proposed changes on the attractiveness of MMFs to our customers. In addition, given SIBI's customer base, we had the ability to gather empirical data from our clients concerning whether and how they would change their use of MMFs if the Proposed MMF Amendments were to be adopted. For this reason, following the Commission's Release in June 2013, SIBI conducted a survey of SunGard customers in an effort to gauge the impact that the Commission's alternative proposals would have on the behavior of our customers that use MMFs for short-term investments or as a cash management vehicle.

Using an online survey, SunGard polled its corporate, government and pension plan customers about the Commission's Proposed MMF amendments. The customers received the survey during

[1] SEC Release Nos. 33-9408, IA-3616; IC-30551; File No. S7-03-13; Money Market Fund Reform; Amendments to Form PF (June 5, 2013) (the "Release").

2100 Enterprise Ave • Geneva, IL 60134 • tel.: 630-482-5150 • www.sungard.com/brokerage

the two-week period of June 30 to July 14. SunGard received responses from 106 customers, twenty of whom added written narrative comments about the Commission's proposed alternatives.

Based on the survey results, we believe that either of the Commission's alternative proposals would make MMFs substantially less attractive to our clients, would substantially diminish the use of MMFs by treasury managers and other institutional investors, and would increase the costs and lessen the efficiency of MMFs. If the results of our client survey are indicative of a broader market sentiment, the Commission's proposals would reduce the overall level of investment in MMFs and, as a result, may have a substantial negative effect on the short-term financing markets. In this comment letter, we present the empirical data gathered from the responses to our customer survey, discuss our assessment of that data in light of what we know about our customers, and offer several other observations concerning the Proposed MMF Amendments.

<u>The Commission's Alternative Proposals</u>

The Commission's stated objectives in advancing the Proposed MMF Amendments are "to address money market funds' susceptibility to heavy redemptions, improve their ability to manage and mitigate potential contagion from such redemptions, and increase the transparency of their risks, *while preserving, as much as possible, the benefits of money market funds*." Release at 1 (italics supplied). We recognize, as the Commission explains (*see* Release, 14-31), that the structure and features of MMFs can create an incentive for MMF shareholders to redeem shares heavily in periods of financial stress, such as that seen during the 2007-2008 financial crisis. In light of that experience, in March 2010, the Commission adopted certain rule changes restricting the amount of lower quality securities that MMFs can hold and requiring funds to maintain specified levels of daily and weekly liquid assets. The Commission's current alternative proposals are informed by the results of subsequent studies indicating that the 2010 amendments may "not [have been] sufficient to address the incentive to redeem when credit losses are expected to cause fund's portfolios to lose value or when the short-term financing markets more generally are expected to, or do, come under stress." (Release at 44)

The Commission's first alternative proposal would require MMFs (other than government and retail money market funds) to sell and redeem shares based on the current market-based value of the securities in their underlying portfolios, i.e., to transact at a "floating" net asset value ("NAV") per share. The second alternative proposal would require money market funds (other than government funds) to impose a liquidity fee of 2% on all redemptions (unless the fund's board determines that it is not in the best interests of the fund) if a fund's weekly liquid assets fall below 15% of its total assets, and would permit funds to suspend redemptions temporarily, *i.e.,* to "gate" the fund under the same circumstances. As stated in the Release, the Commission could adopt either alternative by itself or a combination of the two alternatives. The Commission is also proposing certain other amendments, including amendments that would require increased diversification of MMF portfolios and enhanced disclosures concerning such things as financial support provided by fund sponsors and daily and weekly liquidity levels.

Throughout its Release (*see, e.g.,* at 12 & 283 *et seq*.), the Commission notes the popularity, efficiency, and importance of MMFs both as a cash management vehicle and as a source of short-term financing:

> "The combination of principal stability, liquidity, and short-term yields offered by money market funds, which is unlike that offered by other types of mutual funds, has made money market funds popular cash management vehicles for both retail and institutional investors . . . . Institutional investors commonly use money market funds for cash management in part because . . . money market funds provide efficient diversified cash management due both to the scale of their operations and their expertise.
>
> Money market funds, due to their popularity with investors, have become an important source of financing in certain segments of the short-term financing markets." (Release at 12, footnotes omitted).

In light of the popularity, efficiency, and marketplace importance of MMFs, the Commission acknowledged its lack of data on the possible unwanted side effects of the alternative proposals and requested comment on the effect its proposals would have on the behavior of investors in MMFs, including institutional investors:

> "[W]e do not have a basis for estimating the number of institutions that might reallocate assets, the amount of assets that might shift, or the likely alternatives under either of our proposals, because we do not know how many of these investors face statutory or other requirements that mandate investment in a stable value product or a product that will not restrict redemptions or how these investors would weigh the tradeoffs involved in switching their investment to various alternative products. We request comment on these issues." (Release at 289)

<u>SunGard Survey Results</u>

Based on the results of its survey, SIBI believes that the likely effect of either the floating NAV proposal or the liquidity fees and gates proposal would be to cause our customers—institutional investors, such as treasury managers at corporations, insurance companies, hedge funds, public utilities, governments, and universities—to shift their money market fund investments to alternative stable value products and thus reduce the amount of money market fund assets under management.

We attach hereto Exhibit <u>A</u>, in which we present the survey results in bar chart form. The survey results may be summarized as follows:

Effect of Alternatives 1 and 2 combined:

- Approximately 37% of respondents reported that Alternatives 1 and 2, if adopted together, would cause them to stop using MMFs entirely.
- Approximately 84% of respondents reported that Alternatives 1 and 2 combined would cause them to decrease their use of MMFs substantially or entirely.
- Less than 1% of respondents reported that Alternatives 1 and 2 combined would result in their increased use of MMF.

Effect of Alternative 1:

- Approximately 29% of respondents reported that Alternative 1 would cause them to stop using MMFs entirely.
- Approximately 85% of respondents reported that Alternative 1 would cause them to decrease their use of MMFs substantially or entirely.
- Fewer than 4% of respondents reported that Alternative 1 would result in their increased use of MMF.

Effect of Alternative 2:

- Approximately 22% of respondents reported that Alternative 2 would cause them to stop using MMFs entirely.
- Approximately 76% of respondents reported that Alternative 2 would cause them to decrease their use of MMFs substantially or entirely.
- No respondents reported that Alternative 2 would result in their increased use of MMF.

Effect of the Proposals on Funding Costs:

- Approximately 56% of respondents believe that the proposals would increase their MMF funding costs.
- Approximately 42% of respondents believe that the proposals would not change their MMF funding costs.
- Less than 1% of respondents believe that the proposals would decrease their MMF funding costs.

The Sufficiency of the 2010 MMF Amendments:

- Approximately 75% of respondents believe that the 2010 amendments were sufficient to protect the MMF market.
- Approximately 21% of respondents believe that the 2010 amendments were not sufficient to protect the MMF market.

The survey results are clear. A substantial percentage of respondents report that either alternative, whether adopted alone or in combination with the other, would result in a significant decrease in the use of MMFs; a majority of respondents believe that the proposals will increase MMF funding costs; and three quarters of all respondents believe that the 2010 amendments were sufficient.

Customer Comments Regarding Diminished Use of MMFs If the Proposals Were Adopted

The survey allowed, but did not require, respondents to provide free-form comments following their responses to the questions. Because only twenty of the respondents chose to add comments, we are reluctant to draw conclusions from the comments but several are nonetheless worth noting.

Several who commented explained that the respondent's indication that it would no longer use MMFs applied only to prime funds subject to the proposals, not to government funds. While several respondents mentioned government funds as an alternative ("will move out of prime funds and some of it will go into government funds"), others mentioned short-term bond funds or unspecified "alternative investments."

Similarly, the underlying reasons for the predicted substantial decline in the use of MMFs appear to vary among respondents. Several respondents indicated that they were subject to investment "guidelines" or strategies that specify "stable NAV funds," the result being that the respondents would be required "to move our money market investments into funds without a floating NAV." Other respondents reported that because they act as fiduciaries or otherwise invest "client money," they "cannot assume any risk around loss of principal via floating NAV, fees or redemption gates."

One respondent commented that Alternative 2 "would definitely be better than Alternative 1." Another respondent thought that "the additional reporting being recommended would be beneficial to investors."

With one exception, however, respondents reported that the essential value or "benefit" of MMFs would be lost as a result of the proposed alternatives. While one respondent commented that a "floating NAV" is not "a bad thing" and "is much better than fixed NAV," this respondent was in a minority of one; the consensus point of view was to the contrary and was expressed by other respondents emphatically: One wrote: "Money funds are used to enable transactions and are not considered an investment vehicle. Variable values make them useless for this purpose." And another wrote: "These reforms would fundamentally change the product negatively."

The SunGard Survey Results Corroborate Results of Earlier Surveys

The responses of SunGard's customers corroborate the results of other, earlier surveys. As the Commission notes, based on a survey of institutional investors, Treasury Strategies estimates that

that "money market fund assets held by corporate, government and institutional investors would see a net decrease of 61%" if the Commission were to require money market funds to use floating NAVs. Release at 287, n. 566. Similarly, a 2012 survey conducted by the Association for Financial Professionals found that "up to 77% of the 391 organizations that responded to the survey would be less willing to invest in floating NAV money market funds, and/or would reduce or eliminate their money market fund holdings if the Commission were to require the funds to use floating NAVs." Release at 287-88. As these and other surveys found, institutional investors, such as corporate treasury departments, fiduciaries, and municipal and state governments, would significantly reduce their reliance on MMFs. *See* Release at 288, n. 567.

With respect to the earlier surveys, the Commission expressed its belief "that the survey data submitted by commenters reflecting that certain investors expect to reduce or eliminate their money market fund investments under the floating NAV alternative may not definitively indicate how investors might actually behave." Release at 300. The Commission noted that the earlier surveys did not consider the exemptions for government and retail funds or the alternative liquidity fees and gates proposal. Such cannot be said of the SunGard survey, which specifically referred to the Commission's alternative proposals. As evidenced by the responses, our customers took into account the different treatment of prime funds and government funds and the differences between the alternative proposals.

<u>SunGard's Customers Rely on Prime MMFs as a Key Cash Management Vehicle</u>

Many of our customers have used the STCM Portal for years. As a result, we have had an opportunity to develop an appreciation for their business needs for short-term cash management. We understand why they would react so negatively to the Commission's proposals. Our corporate clients rely to a large extent on so-called institutional prime money market mutual funds ("prime funds") to efficiently and safely manage their corporate liquidity on a day-to-day basis. Their cash needs and liquidity positions are highly synchronized, and have been for decades, and are dependent on the use of prime funds in their current configuration, particularly the ability to effect purchases and redemptions at $1.00 per share. For many clients, prime funds have become an investment of choice primarily because of their independent credit ratings, transparency and the diversification of risk among the securities of multiple issuers. From a corporate treasurer's perspective, moving more funds to bank deposits is not without problems in that they come with concentration and counterparty risk. From our client's perspective, any rule that results in the withdrawal of the ability of prime funds to value their portfolio securities at amortized cost (hence assuring in most circumstances that purchases and redemptions will not be effected at $1.00 per share), will cause them to reassess the use of such funds and, in all likelihood, curtail or substantially cut back on their use.

The precision and sophistication with which our clients currently manage their liquidity positions to maximize returns will be fractured, and the introduction of a net asset value per share computed on a mark-to-market basis (causing their cash position to fluctuate in value) will result in the creation of nothing more than an ultra-short bond fund, the characteristics of which would not coincide with our client's existing policies or systems capacities with respect to liquidity management. Short term bond funds with fluctuating net asset values experienced similar liquidity issues after the Lehman bankruptcy and one can argue that their fluctuating net asset value did not prevent but actually encouraged client redemptions.

Because of the Potential for Harm, the Commission Should Not Adopt Either Proposal

The consistency of the results of both the earlier surveys and the SunGard survey demonstrates that for SIBI's customers and other institutional investors the Commission's proposals would fail to achieve one of the Commission's objectives that was stated at the outset, *i.e.*, to preserve "*as much as possible the benefits of money market funds.*" Release at 1 (emphasis supplied). As the surveys reveal, institutional investors will find prime MMFs in large measure "useless" and "fundamentally" and "negatively" changed and will significantly reduce their reliance on MMFs. Products that have been rendered useless or that have been fundamentally and negatively changed have not had their benefits preserved in any meaningful respect.

But the potential for harm in these proposals is actually more widespread. As the Commission correctly observes:

> "Because prime money market funds' holdings are large and their investment strategies differ from some investment alternatives, a shift by investors from prime money market funds to investment alternatives could affect the markets for short-term securities. The magnitude of the effect will depend on not only the size of the shift but also the extent to which there are portfolio investment differences between prime money market funds and the chosen investment alternatives. . . .
>
> "If . . . capital flowed from money market funds, which traditionally have been large suppliers of short-term capital, to bank deposits, which tend to fund longer-term lending and capital investments, issuers and the short-term financing markets may be affected to a greater extent. Similarly, if capital flowed from prime money market funds to government money market funds because government money market funds are exempt from further reforms, issuers that primarily issue to prime funds (and thus the short-term financing markets) would be affected." Release at 305-06.

The Commission notes that "we currently do not have estimates of the amount of assets money market fund investors might migrate to investment alternatives," and "recognize that shifts from money market funds into other choices could affect issuers of short-term debt securities and the short-term financing markets." Release at 304. Given what we are able to discern from the results of the SunGard survey and other earlier surveys, namely that the benefits of MMFs have not been preserved, and given what is not well understood about the consequences that may flow from the adoption of the Commission's alternative proposals, SIBI respectfully urges the Commission to adopt neither alternative. We have serious concerns that the proposed alternatives may have far-reaching adverse consequences not only for MMFs, but also for our clients and the countless other businesses that have come to rely on MMFs as central to their short-term cash management activities.

The Sufficiency of the 2010 Amendments

As shown above, the Commission's alternative proposals would fail to preserve the benefits institutional investors derive from MMFs and would potentially do harm to the short-term financing market. Moreover, the proposals are unneeded to address the Commission's concerns. Seventy-five percent of respondents to the SunGard survey said that they thought that the 2010 reforms were sufficient to protect the market. And the November 2012 SEC Staff analysis prepared in response to questions from Commissioners Aguilar, Gallagher and Paredes demonstrates this conclusion as well, documenting dramatically enhanced MMF liquidity and a substantial decrease in the likelihood of a MMF breaking a dollar. [2] The very high portfolio liquidity of MMFs, together with credit quality and transparency, address the "run" issue. Because is not clear at this time that any additional changes to MMF regulation are warranted and because the proposed changes may actually do harm, we respectfully urge the Commission to refrain from implementing fundamental and negative changes to a popular and efficient cash management vehicle.

The Alternative Proposals Will Not Deter Widespread Redemptions in a Crisis

The stated purposes behind Alternative 1 for imposing VNAV on prime institutional MMFs are to: (i) reduce widespread "run" redemptions by shareholders in a crisis; and (ii) to educate MMF shareholders of the risk in MMFs. The Commission recognizes, however, that the use of VNAV will not really deter or eliminate runs. Indeed, neither the FSOC, nor the Federal Reserve,[3] nor any credible commentator believes that use of VNAV will deter or eliminate runs in a crisis.[4] So the Commission's first stated purpose is not met by Alternative 1. In view of the very extensive and prominent prospectus disclosures of the risk that a MMF can "break a buck" (not to mention the extensive discussion of the issue in the press and regulatory commentary), the many surveys and testimony documenting that investors understand this risk,[5] and the fact that institutional

[2] Report by the Division of Risk, Strategy, and Financial Innovation, *Response to Questions Posed by Commissioners Aguilar, Paredes, and Gallagher*, (November 30, 2012).

[3] FSOC, *Proposed Recommendations Regarding Money Market Mutual Fund Reform*, 77 FR 69455 (November 19, 2012), p. 69467; McCabe, et al., Federal Reserve Bank of New York Staff Study No. 564: *Minimum Balance at Risk: Proposal to Mitigate the Systemic Risks Posed by Money Market Funds*, pp. 6, 54 (July 2012).

[4] Hal Scott, *Interconnectedness and Contagion*, Committee on Capital Markets Regulation, 224 (November 20, 2012) ("[F]loating NAV does not address the risk of contagion among MMMF investors."); Professors D. Blackwell, K. Troske, and D. Winters, *Money Market Funds Since the 2010 Regulatory Reforms: More Liquidity, Increased Transparency, and Lower Credit Risk* (Fall 2012).

[5] *See* Letter from Fidelity Investments to SEC (February 3, 2012) (describing results of surveys of retail and institutional investors); Letter from National Association of State and Local Treasurers to SEC (December 21, 2010); Testimony of Maryland State

Footnote continued on next page

investors clearly can grasp this issue, the second stated purpose behind Alternative 1 does not warrant the tremendous costs and disruption that the VNAV proposal would bring about. Per a recent study by Treasury Strategies and the U.S. Chamber of Commerce, the total up-front costs for U.S. MMF institutional investors to modify operations in order to comply with a floating NAV will be between $1.8 and $2 billion.[6] Investors already know that MMF shares can lose value, and institutional shareholders know this fact better than anyone. Imposing Alternative 1 therefore provides no real benefit to investors, markets or the economy.

Alternative 2, because its restrictions will apply only when needed – on the very rare occasion when seven-day liquidity drops below a threshold amount, has the benefit of preserving the essential characteristics of MMFs, while also giving MMF boards the tools to stop a run if necessary. This back-stop, combined with the very large increase in liquidity driven by the 2010 amendments to rule 2a-7, fully addresses run risk, while preserving the core functionality of MMFs of a stable $1/share price and prompt intra-day processing of transactions. While the survey responses of SunGard's customers were highly critical of both alternative proposals, and while SunGard believes that the Commission should not adopt either proposal, Alternative 2 may create less risk of harm than Alternative 1.

Added Costs; Accounting and Recordkeeping Burdens

The SunGard survey also shows that 56% of respondents believed their funding costs would increase if the alternative proposals were enacted. Given the importance of MMFs throughout the US economy, and the manner in which they are used, such a result is both plausible and undesirable.

MMFs are used in connection with several different brokerage account functions. Processing and accounting for each of these functions on our systems is made efficient by the stable $1/share pricing and prompt, frequent intra-day settlement features currently available with MMFs. These include sweeps into MMFs of customer brokerage cash balances from new cash, sales of securities and receipts of dividends, and sweeps from MMFs to pay for purchases of securities in the customer brokerage accounts. Before the invention of MMFs, these balances were held as "free credit balance" obligations of the broker-dealer at no interest. MMF sweeps allow our customers to earn interest and protect the customer against credit risk.

Footnote continued from previous page

Treasurer Nancy Kopp Before the Subcommittee on Capital Markets and Government Sponsored Enterprises of the House Committee on Financial Services (Apr. 25, 2012) (webcast archive: http://financialservices.house.gov/Calendar/EventSingle.aspx?EventID=290689).

[6] *See* Study: Operational Implications of a Floating NAV across Money Market Fund Industry Key Stakeholders from U.S. Chamber of Commerce's Center for Capital Markets Competitiveness (Summer 2013); http://www.centerforcapitalmarkets.com/wp-content/uploads/2010/04/Floating-NAV-Report_Final3.0docx.pdf

Two features of MMFs make them ideally suited for corporate treasuries holding short-term liquidity: (1) a stable $1 NAV throughout the course of the day, which creates the predictability of value necessary for the use of MMFs in settling payment obligations; (2) frequent, prompt intra-day processing and settlement of purchase and redemption orders, which is only possible because of a stable $1 NAV and the use of amortized cost accounting to determine portfolio values.

Yet these are the very features of MMFs that would be directly undermined by the proposed reforms. A floating NAV would preclude same-day settlement, because the precise value of a fixed number of MMFs shares would not be known until prices are determined at market close. SunGard Data Systems Inc. is also an investor in MMFs and we and our customers rely on the same-day settlement capability of MMFs.

The accounting and recordkeeping systems that we use to process these transfers and payments are highly automated, and link together with automated systems of banks and the MMFs' transfer agents. It would be very expensive (and potentially not economically viable) to rebuild our automated systems to process these transfers and payments at other than $1/share. Due to the large volume of transactions and the need to coordinate the timing of the MMF share purchase and redemption with the offsetting cash payment transaction, these transactions must be processed quickly throughout the day. Any changes to MMF valuation, pricing, or processing times that would delay or interfere with the processing of transactions would greatly reduce the usefulness of MMFs for these functions.

The processing of MMF share transactions to meet the needs of our corporate clients would be compromised if Alternative 1 were adopted. VNAV MMFs would not maintain a stable $1/share NAV and would be difficult to settle on a same day basis with the same flexibility as current MMFs. In addition, prohibiting use of amortized cost accounting for government MMFs and retail MMFs that maintain a stable NAV would greatly complicate the process of establishing MMF share prices for purchases and redemptions, the timing and efficiency of settlements of MMF share purchases and redemptions and consequently coordinating the cash flows for MMF share purchases and redemptions with the other half of the related cash transactions.

The Commission's Release accompanying the Proposed MMF Amendments makes the assumption that, if shares are rounded to the nearest penny, there is no need to use amortized cost accounting. This is not a correct assumption. If CNAV share prices are valued using mark-to-market or mark-to-model portfolio prices with share prices rounded to nearest cent, the price of the portfolio changes very slightly throughout the day, requiring constant coordination by the MMF and updating share prices with market or model price information generated after the purchase order is received, which is then rounded to the nearest cent. This introduces a time delay between the receipt of the MMF share purchase or redemption order, the processing of that order (so that prices can be recalculated) and the subsequent settlement of that order. It also introduces additional processing costs for the calculating and striking of that share price -- even though the price is still rounded to the nearest penny. Together, the increased cost of pricing and the delay in pricing will lengthen processing and settlement times and makes it difficult to coordinate MMF share purchases and redemptions with the related cash transactions. The elimination of amortized cost accounting at government funds and retail funds that are permitted to use a stable net asset value will make late-day settlements more difficult, and reduce the number of times during the day that intra-day settlements can be conducted.

In contrast, with amortized cost accounting, absent an unusual issuer credit event affecting portfolio values, there is only one portfolio value per share all day, which is rounded to the nearest cent. This speeds up the timing of processing the purchase or redemption order and settlement of the transaction and reduces the cost of valuing shares and settling the transaction. In both cases, the shares are rounded to the nearest penny, but with amortized cost accounting it is far easier, faster and less costly to get to that price and process and settle the purchase or redemption order.

<u>Conclusion</u>

As shown in the results of the SunGard customer survey, as well as in other survey results, the proposed alternatives would fundamentally and negatively affect the value of MMFs for SunGard customers and other institutional investors. Not only are MMFs a key cash management vehicle for institutional investors, they play a significant role in the short-term financing market, which also may be harmed by the Commission's proposed alternatives.

The Commission's regulation and oversight of MMFs has been robust and successful, and we and our customers believe that the 2010 amendments were effective in enabling MMFs to weather periods of unusual redemptions in 2011. Moreover, we believe that the proposed alternatives would not be effective in deterring widespread redemptions in a crisis and will impose unneeded administrative and funding costs on investors and broker-dealers. In addition, moving capital away from MMFs will negatively impact corporations and governments that rely on MMFs for short-term capital liquidity needs. We do not believe further changes to the Commission's program of regulation of MMFs are needed at this time and urge the Commission not to adopt either proposed alternative.

Respectfully submitted,

SUNGARD INSTITUTIONAL BROKERAGE INC.

By: ______________________

Robert A. Santella
President & Chief Executive Officer

EXHIBIT A
SunGard Survey Results

If enacted, how would Alternative 1: Floating NAV impact the amount of assets you invest in money funds?

		Response percent	Response total
Decrease the use by 0-33%		**13.21%**	14
Decrease the use by 33%-66%		**11.32%**	12
Decrease the use more than 66%		**31.13%**	33
Increase the use by 0-33%		**1.89%**	2
Increase the use by 33%-66%		**0.94%**	1
Increase the use more than 66%		**0.94%**	1
This will not affect me at all		**15.09%**	16
Will stop using money funds all together		**29.25%**	31
Comments		**20.76%**	22

Total # of respondents **106**

If enacted, how would Alternative 2: Liquidity Fees and Redemption Gates impact the amount of assets you invest in money funds?

		Response percent	Response total
Decrease the use by 0-33%		**19.81%**	21
Decrease the use by 33%-66%		**15.09%**	16
Decrease the use more than 66%		**19.81%**	21
Increase the use by 0-33%		**0%**	**0**
Increase the use by 33%-66%		**0%**	**0**
Increase the use more than 66%		**0%**	**0**
This will not affect me at all		**26.42%**	28
Will stop using money funds all together		**21.7%**	23
Comments		**12.26%**	13

Total # of respondents **106**

EXHIBIT A (continued)
SunGard Survey Results

If enacted, how would Alternative 3: Combination of Floating NAVs, Liquidity Fees and Redemption Gates impact the amount of assets you invest in money funds?

	Response percent	Response total
Decrease the use by 0-33%	10.38%	11
Decrease the use by 33%-66%	16.04%	17
Decrease the use more than 66%	20.76%	22
Increase the use by 0-33%	0%	0
Increase the use by 33%-66%	0%	0
Increase the use more than 66%	0.94%	1
This will not affect me at all	13.21%	14
Will stop using money funds all together	36.79%	39
Comments	14.15%	15

Total # of respondents **106**

If enacted, how would these proposals affect your funding costs?

	Response percent	Response total
The reforms will increase my funding cost	55.66%	59
The reforms will decrease my funding costs	0.94%	1
No change	41.51%	44
Comments	5.66%	6

Total # of respondents **106**

Do you think the 2010 money market fund reforms were sufficient to protect the market?

	Response percent	Response total
Yes	75.47%	80
No	20.76%	22
Comments	6.6%	7