

(19) World Intellectual Property Organization
International Bureau



(43) International Publication Date
22 November 2007 (22.11.2007)

PCT

(10) International Publication Number
WO 2007/133242 A1

(51) International Patent Classification:
G07B 17/00 (2006.01)

(21) International Application Number:
PCT/US2006/034981

(22) International Filing Date:
8 September 2006 (08.09.2006)

(25) Filing Language: English

(26) Publication Language: English

(30) Priority Data:
11/434,241 16 May 2006 (16.05.2006) US

(71) Applicant (for all designated States except US): NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC. [US/US]; 1735 K Street, N.W., Washington, DC 20006 (US).

(72) Inventors; and

(75) Inventors/Applicants (for US only): WOLLIN, Elizabeth, Anne [US/US]; 9515 Macy Avenue, Vienna, VA 22182 (US). BELCHER, Sherilyn, Smith [US/US]; 1256 Stevens Avenue, Baltimore, MD 21227 (US). MOON, Jung, Hun Kim [ES/US]; 4201 Cathedral Avenue, N.W., Apt. 112W, Washington, DC 20016 (US).

(74) Agent: GARRETT, Arthur, S.; Finnegan, Henderson, Farabow, Garrett & Dunner, LLP, 901 New York Avenue, NW, Washington, DC 20001 (US).

(81) Designated States (unless otherwise indicated, for every kind of national protection available): AE, AG, AL, AM, AT, AU, AZ, BA, BB, BG, BR, BW, BY, BZ, CA, CH, CN, CO, CR, CU, CZ, DE, DK, DM, DZ, EC, EE, EG, ES, FI, GB, GD, GE, GH, GM, HN, HR, HU, ID, IL, IN, IS, JP, KE, KG, KM, KN, KP, KR, KZ, LA, LC, LK, LR, LS, LT, LU, LV, LY, MA, MD, MG, MK, MN, MW, MX, MY, MZ, NA, NG, NI, NO, NZ, OM, PG, PH, PL, PT, RO, RS, RU, SC, SD, SE, SG, SK, SL, SM, SV, SY, TJ, TM, TN, TR, TT, TZ, UA, UG, US, UZ, VC, VN, ZA, ZM, ZW.

(84) Designated States (unless otherwise indicated, for every kind of regional protection available): ARIPO (BW, GH, GM, KE, LS, MW, MZ, NA, SD, SL, SZ, TZ, UG, ZM, ZW), Eurasian (AM, AZ, BY, KG, KZ, MD, RU, TJ, TM), European (AT, BE, BG, CH, CY, CZ, DE, DK, EE, ES, FI, FR, GB, GR, HU, IE, IS, IT, LT, LU, LV, MC, NL, PL, PT, RO, SE, SI, SK, TR), OAPI (BF, BJ, CF, CG, CI, CM, GA, GN, GQ, GW, ML, MR, NE, SN, TD, TG).

Published:

- with international search report
- before the expiration of the time limit for amending the claims and to be republished in the event of receipt of amendments

For two-letter codes and other abbreviations, refer to the "Guidance Notes on Codes and Abbreviations" appearing at the beginning of each regular issue of the PCT Gazette.



WO 2007/133242 A1

(54) Title: CAPITAL-ADEQUACY FILING AND ASSESSMENT SYSTEM AND METHOD

(57) Abstract: Systems and methods of capital-adequacy filing and assessment for determining compliance with capital-adequacy rules include an authorized-entity computer and a processing computer in electronic communication with the authorized-entity computer. Such systems and methods can include an analysis-rule-configuration component, a data-reception component and a rules engine.

CAPITAL-ADEQUACY FILING AND ASSESSMENT SYSTEM AND METHOD

DESCRIPTION OF THE INVENTION

This application claims priority to U.S. Patent Application No. 11/434,241, filed on May 16, 2006.

Field of the Invention

[001] This invention relates generally to computer systems and more particularly to systems and methods for receiving, processing, and analyzing financial data relating to financial institutions' compliance with capital-adequacy rules.

Introduction

[002] The efficient functioning of financial markets requires participants to have confidence in the markets' stability and the ability of participants in the market to fulfill financial obligations. The failure of a financial firm to run its business prudently may cause financial loss to investors and consumers, and possibly insolvency. In addition, such failure may damage confidence in the financial industry as a whole, which would have adverse effects for the financial sector and, potentially, the entire economy.

[003] Capital-adequacy rules govern the amount and management of net capital reserves available to a financial firm or professional. These rules constitute one tool to limit financial losses from mismanagement, and they help foster confidence in the financial industry by setting minimum standards for the financial resources that members of a financial community must maintain. Capital-adequacy rules may also define acceptable behavior by members of a financial community.

[004] The types and requirements of capital-adequacy rules can be

complex, and such rules vary widely among financial markets and regulating institutions. The level and types of capital-adequacy rules may also vary with a financial institution's business activity.

[005] Capital-adequacy rules establish the standards that are the basis of analysis for regulators supervising financial institutions by providing objective measures of a financial firm's health and its management behavior. Examples of capital-adequacy rules include the U. S. Securities and Exchange Commission rules on net capital (17 C.F.R. § 240.15c3-1 (2006) Net Capital Requirements for Brokers and Dealers).

[006] For the most part, independent or government regulatory bodies establish capital-adequacy rules. In the following description, the term "authorized entity" refers to a firm or entity, such as a securities dealer or brokerage firm, subject to capital-adequacy rules. To determine and ensure compliance with capital-adequacy rules, regulatory bodies require authorized entities to file financial data periodically. As used in this description, the term "compliance" not only includes avoiding violations of rules, but also avoiding behaviors that suggest an impending violation of rules. This type of behavior is often indicated by evaluation of trends in the financial data. To be effective, a regulatory body should provide some method of enforcement to assess and ensure compliance.

[007] Although regulators may review a firm's existing financial statements to ensure compliance with capital-adequacy rules, financial statements alone are not an efficient way to ensure compliance with rule. For example, financial statements are not generally standardized, and they often contain large amounts of information not necessary to assess compliance. Furthermore, they may omit information necessary to assess compliance. Another disadvantage is that the financial statements generally do not make it easy to perform period-to-period trend analysis—a valuable technique in identifying firms with potential problems. As a result of the difficulties with financial statements, regulators generally require firms to make periodic filings directed specifically to the assess requirements of the capital-adequacy rules.

[008] As the number of financial firms subject to the capital-adequacy rules grows, regulators have greater difficulties in processing, reviewing, and assessing the information filed to determine whether firms are complying with the capital-adequacy rules. As a result, some have proposed computer systems that allow regulators to receive and process electronic data to determine compliance with capital-adequacy rules. For the most part, however, these computer systems have proven inadequate for effectively monitoring compliance with capital-adequacy rules in current financial markets. For example, the number of financial markets has grown in recent years to include significant financial markets in many different countries. Several regulatory bodies monitor these financial markets, and each of those bodies may have different capital-adequacy rules. Existing systems for accepting and processing financial data to monitor compliance are generally developed just for one financial market with its own particular set of capital-adequacy rules, and may often not be configurable for financial markets having different capital-adequacy rules.

[009] Another problem of existing systems is that the regulatory staff who determine and interpret capital-adequacy rules often cannot implement such rules themselves in the computer software. For example, when implementing a monitoring system in a new market with different capital adequacy rules, any existing, custom, computer software may need to be extensively reprogrammed to reflect the requirements of the new market. The reprogramming may require technical expertise that the staff does not have because it may involve changing source code or data files and then "rebuilding" the software, recompiling source code to generate object code and linking the object code with libraries of other object code to generate a new executable file.

[010] The systems and methods consistent with this invention overcome these and other drawbacks of existing systems and methods for monitoring compliance with capital-adequacy rules, and offer additional advantages. The claims define the specific invention, which is not limited to the disclosed system and methods.

SUMMARY OF THE INVENTION

[011] An automatic method for determining compliance with capital-adequacy rules consistent with the invention comprises configuring a set of analysis rules; receiving, from an authorized entity at a data processing system, electronic financial data relevant to the capital of an authorized entity; analyzing the received financial data by the data processing system using the configured analysis rules to determine whether the capital of the authorized entity is in compliance with the capital-adequacy rules; and providing a notification of noncompliance when the capital of the authorized entity is not in compliance with the capital adequacy rules.

[012] A capital-adequacy filing and assessment system for determining compliance with capital-adequacy rules consistent with the invention comprises an authorized-entity computer; and a processing computer in electronic communication with the authorized-entity computer. The processing computer includes an analysis rule configuration component that configures analysis rules for analyzing financial data relating to capital-adequacy rules, a data reception component for receiving financial data relating to capital-adequacy rules from the authorized-entity computer, and a rules engine to analyze the financial data relating to capital-adequacy rules received from the authorized-entity computer using the analysis rules configured by the analysis configuration component.

BRIEF DESCRIPTION OF THE DRAWINGS

[013] The accompanying drawings, which are incorporated in and constitute a part of the specification, show exemplary implementations consistent with the invention.

[014] Figure 1 is a block diagram of an exemplary system consistent with the present invention for collecting and processing financial data to monitor compliance with capital-adequacy.

[015] Figure 2 is a flow diagram of an exemplary method consistent with the present invention for monitoring compliance with capital-adequacy rules.

[016] Figure 3 is a screen shot of an exemplary menu of forms available in an electronic-filing application installed on an authorized-entity computer consistent with the present invention.

[017] Figure 4 is a screen shot of an exemplary General Information form consistent with the present invention.

[018] Figure 5 is a screen shot of an exemplary asset-data form consistent with the present invention.

[019] Figure 6 is a screen shot of an exemplary liability-data form consistent with the present invention.

[020] Figure 7 is a screen shot of an exemplary ownership-equity form consistent with the present invention.

[021] Figure 8 is a screen shot of an exemplary income-data form consistent with the present invention.

[022] Figure 9 is a screen shot of an exemplary net-capital-data form consistent with the present invention.

[023] Figure 10 is a screen shot of an exemplary net-capital-requirements-computation form consistent with the present invention.

[024] Figure 11 is a graphical representation of an exemplary error message consistent with the present invention.

[025] Figure 12 is a block diagram of an exemplary processing-computer portion of CAFA system consistent with the present invention.

[026] Figure 13 is a block diagram of a server consistent with the present invention.

[027] Figure 14 is a flow diagram of a method consistent with the present invention to determine whether an authorized entity has sufficient net capital for the type of business the authorized entity conducts.

[028] Figure 15 is a flow diagram of a method consistent with the present invention to determine whether an authorized entity is experiencing erosion of excess net capital.

[029] Figure 16 is a flow diagram of a method consistent with the present invention to determine whether an authorized entity is experiencing losses and

the rate of such loss in order to estimate the number of months of current losses that will deplete the current level of excess net capital.

[030] Figure 17 is a flow diagram of a method consistent with the present invention, to identify misclassification of non-allowable assets by an authorized entity.

[031] Figure 18 is a flow diagram of a method, consistent with the present invention to determine whether the current total liabilities are zero, and if so, to determine whether this result is an anomaly for the authorized entity.

[032] Figure 19 is a flow diagram of a method consistent with the present invention to determine whether the authorized entity has identified a new revenue type.

[033] Figure 20 is a flow diagram of a method consistent with the present invention to determine whether the equity data reported by the authorized entity reconciles.

[034] Figure 21 is an example of a screenshot that might be used to provide a summary report of exceptions in a system that is consistent with the disclosed invention.

[035] Figure 22 is a screen shot of an exemplary exception report consistent with the present invention.

[036] Figure 23 shows one example of a process for configuring a CAFA system consistent with the present invention.

[037] Figure 24 illustrates an example of a rules-generator selection screen consistent with the present invention.

[038] Figure 25 is a screen shot of an exemplary threshold-configuration feature consistent with the present invention.

[039] Together with the summary description above and the detailed description of the embodiments below, the drawings help explain the principles of the invention.

DETAILED DESCRIPTION OF THE INVENTION

[040] Reference will now be made in detail to implementations consistent

with the invention illustrated in the accompanying drawings. In those drawings, like elements and operations use the same reference numbers when possible.

[041] Systems and methods consistent with the invention allow the collection and analysis of financial data relating to capital-adequacy rules. Such systems and methods allow filing such financial data and analyzing it to determine whether an authorized entity is complying with capital-adequacy rules. In general, determining compliance with capital-adequacy rules includes assessing actual rules violations, examining trends suggesting an authorized entity has fallen or may likely fall out of compliance, and evaluating other events of regulatory interest.

[042] An authorized entity, or any other entity, can enter financial data into electronic forms on an authorized entity's computer and transmit the data to a capital-adequacy filing and assessment system. That system receives the data and analyzes the data to determine whether that entity is complying with capital-adequacy rules. Preferably, the system evaluates the collected financial data against capital-adequacy rules, which rules the system can allow a user to adapt to new or different rules easily. For example, a user can configure the rules by selecting a set of rules from a library of existing analysis rules, by generating or editing the rules using a rules generator, or by adjusting threshold values of existing rules.

[043] Figure 1 is a block diagram of an exemplary system consistent with the invention for collecting and processing financial data to monitor compliance with capital-adequacy. The system of Figure 1 includes a capital-adequacy filing and assessment (CAFA) system **400**, one or more authorized-computers **402**, and a network **404**. The exemplary system may include any number of authorized-entity computers **402**, which can include any type of computer interface. CAFA system **400** connects to computers **402** via network **404**, which can be any type of known network, such as the Internet, a Local Area Network (LAN), or a Wide Area Network (WAN). Alternatively, two CAFA systems may be connected to each other by a network to provide redundancy by storing, processing, and analyzing the financial data in parallel or for any other purpose.

[044] Figure 2 is a flow diagram of an exemplary method consistent with the invention for monitoring compliance with capital-adequacy rules. Financial information gathered from an authorized entity (step 502) comes from electronic forms or any other means. The financial information travels over network 404 to CAFA system 400 (step 504). CAFA system 400 stores the financial data (step 506), and may process and analyze the financial data to determine whether the authorized entity is complying with capital-adequacy rules (step 508).

[045] Preferably, CAFA system 400 generates reports based on the results of the processing (step 510). The reports describe the level of compliance with capital-adequacy rules for each authorized entity. The reports can also point out exceptions and errors.

[046] If financial information is gathered using electronic forms, such forms may be accessible through a website, as part of an existing application, or as part of a stand-alone, electronic-filing application. The forms could solicit identifying information for each authorized entity as well as information regarding business activities, assets, liabilities, ownership equity, revenue, income, and resulting net capital.

[047] Figure 3 is a screen shot of an exemplary menu of forms, consistent with the present invention, available in an electronic-filing application on an authorized-entity computer 402. Whenever the term "screen shot" is used in this description, it is meant to refer to both complete and partial displays of data. The menu allows an authorized entity to navigate between the electronic forms that collect the data a regulatory body requires. For example, selecting the "General Information" option in the menu displays the General Information form.

[048] Figure 4 is a screen shot of an exemplary General Information form consistent with the present invention. This General Information form may be the initial form an authorized entity competes. Other forms may be inaccessible until all of the required general information is supplied. The exemplary General Information form solicits identifying information regarding the authorized entity using a combination of data-entry fields, drop-down menu fields, and radio

buttons. The information solicited by the General Information form specifies the type of business of the authorized entity participates to allow selection of the proper capital-adequacy rules, as those rules may vary according to the entity's business activity.

[049] The General Information form (and other forms) may include fields populated by the electronic-filing application. For example, when a user selects the start button at the lower part of the screen, the system may launch a "save as" window to allow the user to save the form on the computer's local hard drive. This example may include a feature that allows other forms to be selected for completion after saving the General Information form.

[050] Figure 5 is a screen shot of a portion of an exemplary Assets form consistent with the present invention. The Assets form solicits information regarding the authorized entity's cash, secured accounts, customers, clearing relationships, securities inventory and any other financial assets. Assets must be classified as 'Allowable' or 'Non-allowable' in this example to be considered in the capital-adequacy computation. These classifications are established by the regulator and take into account recognized local and/or international accounting standards. The form reflects a series of data elements followed by "Allowable" and "Non-Allowable" fields. The authorized entity preferably enters asset information into these fields. As with the General Information form, the shaded fields of the assets form represent values calculated and populated by the electronic-filing application. For example, field 1c in Figure 5 represents total cash and is calculated and populated by the electronic-filing application based on the user-entered fields of allowable cash 1a and non-allowable cash 1b. The information in the Assets form may be saved on the authorized-entity computer's hard drive.

[051] Figure 6 is a screen shot of a portion of an exemplary Liabilities form consistent with the present invention. The Liabilities form solicits information regarding the authorized entity's liabilities, including loans, notes, expenses, debts, taxes and any other financial liabilities. Liabilities are classified as 'Aggregate Indebtedness' (A.I.) or 'Non-Aggregate Indebtedness' (non-A.I.) in this

example. In general, a regulator establishes these classifications and identifies values to be considered in calculating liabilities for determining capital-adequacy. The form reflects a series of data elements followed by the "A.I. Liabilities" and "Non-A.I. Liabilities" fields. Preferably, the authorized entity enters liability information into these fields. As with the General Information form, the shaded fields of the Liabilities form represent values the electronic filing application calculates and populates. The information in the Liabilities form may be saved to the authorized-entity computer's hard drive.

[052] Figure 7 is a screen shot of an exemplary Ownership Equity form consistent with the present invention. The Ownership Equity form solicits financial information regarding the authorized entity's stock holdings, retained earnings, and ownership interests, as well as any other financial equity. As with the General Information form, the application calculates the values in the shaded fields of the Ownership Equity form based on the authorized entity's prior inputs, reflecting the total amount of equity, total amount of ownership equity, and the resulting aggregated amount of liabilities and ownership equity. The information in the Owner Equity form may be saved on the authorized-entity computer's hard drive.

[053] Figure 8 is a screen shot of a portion of an exemplary Income Statement form consistent with the present invention. The Income Statement form solicits financial information relating to the authorized entity's revenue and expenses. The shaded fields of the Income Statement form represent values calculated and populated by the electronic-filing application based on other information entered into the form. The information in the Income Statement form may be saved to the authorized-entity computer's hard drive.

[054] Figure 9 is a screen shot of a portion of an exemplary Net Capital Data Entry form consistent with the present invention. In this example, the Net Capital Data Entry form solicits financial information regarding qualifying ownership equity, subordinated liabilities, and market-risk charges. An authorized entity can enter the equity, liability, and adjustment information into each field. The shaded fields of the Net Capital Data Entry form represent values calculated

and populated by the electronic-filing application based on other information entered into the form. The information in the Net Capital Data Entry form may be saved to the authorized-entity computer's hard drive.

[055] Figure 10 is a screen shot of an exemplary Net Capital Requirements Computation form consistent with the present invention. The Net Capital Requirements Computation form solicits additional net capital information beyond that requested by the Net Capital Data Entry form of Figure 9. Specifically, it requests data regarding money owed to the authorized entity. Thus, in field 320a, an authorized entity must enter the total monies owed to the authorized entity in excess of fifty percent of net capital. Once again, the shaded fields are calculated and populated by the application.

[056] Once the application gathers all the required information, the electronic-filing application may perform a validation check to ensure the required fields are populated correctly. For example, the application may verify that data supplied for each field has the correct format (e.g., entirely numeric, alphanumeric, etc.). The validation process may also include simple accounting checks. For example, in one embodiment, the application may verify that total assets are greater than zero, the total liabilities are greater than zero, and that the total assets equals total liabilities plus total ownership equity. If the validation is not successful, an error message may be displayed describing the nature of the problem.

[057] Figure 11 is a screenshot of an exemplary validation error message. If the validation procedure is successful, the application may display a message indicating that the validation was successful and that the forms are ready for submission to the regulatory body.

[058] Once all of the authorized entity information has been collected, it is sent to CAFA system 400 (step 504 in Figure 2). The mechanism used for this is not important. For example, it could be e-mail; use of a webpage; or an FTP site. For example, when directed to send the forms to CAFA system 400, the application may save all completed forms in two separate file formats, a text file and a PDF file, attach the two files to an email and send the e-mail with the

attached files to CAFA system **400** via the network. The files may also be encrypted or compressed prior to transmission to CAFA system **400**.

[059] Upon receiving financial data from authorized entities, CAFA system **400** may log and store the received data to manage and record when a particular authorized entity filed financial data. Preferably CAFA system **400** stores the received forms and data in a database.

[060] Figure 12 is a block diagram of an exemplary processing-computer portion of CAFA system **400** consistent with the present invention. System **400** includes a server **602**, a database **604**, and one or more workstations **606**, all of which may be connected to each other by any means, such as by a Local Area Network (LAN). Server **602** may be any type (e.g., Windows 2003 Server), and contains and runs applications used CAFA system **400**.

[061] Database **604** may be of any type (e.g., a relational database). Database **604** may store data relating to the CAFA system including financial data and forms received from authorized entities, results of analyses and reports generated by the CAFA system. Workstation **606** can be any type (e.g., a personal computer), and allows access to server **602** and database **604**. In this example, server **602** is also connected to network **404**.

[062] Figure 13 is a block diagram of server **602** consistent with the present invention. Server **602** includes a data-reception and management component **702**, a database-access component **704**, an analysis (rules) component **706**, and a report-generation component **708**. The analysis component also acts as a rules engine.

[063] Data-reception and management component **702** allows CAFA system **400** to accept electronic filing data from authorized entities. In one embodiment, forms containing filing data are transmitted from authorized entities to CAFA system **400** by email, and the data acceptance and management component **702** is a Microsoft Exchange Server. In another embodiment, where forms are completed by authorized entities by accessing a website, the data acceptance and management component **702** may be a web server.

[064] Data-reception and management component **702** may also include utilities to log receipt of data from authorized entities, including the name or identifier of the authorized entity, the filing period, and the date of filing. In one embodiment, all received forms are saved in a central location (e.g., the hard drive of the server **602**) until the end of a reporting period. At that time, when all forms received during the reporting period are transferred to database **604** using the database-access component **704**. Alternatively, forms are transferred to and saved in a database **604** immediately upon receipt by CAFA system **400**.

[065] Database-access component **704** may include software to provide data connectivity to the database **604**. Database-access component **704** may include Object Linking and Embedding for Databases (OLE DB) capable of interacting with SQL databases.

[066] Analysis component **706** may include software that runs on server **602** to analyze filing data submitted by authorized entities to determine whether authorized entities comply with capital-adequacy rules and to identify trends in filings and in an authorized-entity's behavior.

[067] Report-generation component **708** generates summaries and reports of analyses performed by the system. Component **708** may be a custom program that is part of the analysis component, an off-the-shelf software program, or any other means of report generation.

[068] Once collected and transmitted to CAFA system **400**, the financial data for an authorized entity must be evaluated relative to the capital-adequacy rules. Figures 14 through 20 are flow diagrams of steps analysis component **706** performs consistent with the present invention to determine compliance with capital-adequacy rules.

[069] Figure 14 is a flow diagram of a method consistent with the present invention to determine whether the authorized entity has sufficient net capital for the type of business the authorized entity conducts. In this exemplary method, analysis component **706** compares required net capital to the actual net capital using collected and stored authorized-entity information (step **802**). If the

required net capital is greater than the actual net capital (step **804**), analysis component **706** notes a lack of compliance, and may generate an exception message (step **806**) such as “actual net capital is less than required.”

[070] If, on the other hand, the required net capital is less than the actual net capital (step **804**), analysis component **706** does not generate an exception message, but compares the actual net capital to a threshold percentage of the required net capital (step **808**) to determine whether the net capital is approaching the required net capital. If so, analysis component **706** notes this as a potential problem, and may generate an exception message (step **806**) such as “actual net capital less than 120% of required net capital.” If the actual net capital is greater than the threshold amount, the system does not produce an exception message.

[071] Figure 15 is a flow diagram of a method consistent with the present invention to determine whether an authorized entity is experiencing erosion of excess net capital. The system first calculates excess net capital (step **902**) by subtracting the required net capital from the actual net capital. The system then compares the calculated excess net capital value with the excess net capital value for the previous reporting period (step **904**). If the current excess net capital value is at least a certain threshold percentage of the value of the authorized entity's excess net capital of the prior reporting period (step **906**), analysis component **706** does not note a problem, and does not generate an exception.

[072] When an authorized entity's excess net capital is less than that threshold amount (step **906**), however, analysis component **706** notes and generates an exception (step **908**), and further assesses the authorized entity's excess net capital. For example, the system compares the excess net capital to the average value of the authorized entity's excess net capital for the previous two reporting periods (step **910**). When, for example, the authorized entity's excess net capital for the reporting period is equal to or greater than a threshold percentage of the average excess net capital for the two prior reporting periods (step **912**), analysis component **706** does not generate an exception. If, on the

other hand, the excess net capital for the reporting period is less than the threshold amount (step **912**), the analysis component **706** notes an exception and generates an exception, including an exception message (step **914**) such as "excess net capital is eroding."

[073] Figure 16 is a flow diagram of a method consistent with the present invention to determine whether an authorized entity is experiencing losses and the rate of loss so as to determine the number of months of current losses that will deplete the current level of excess net capital. Analysis component **706** determines whether the reported monthly income is equal to or greater than zero (step **1002**). If yes, then component **706** does not generate an exception, and proceeds to additional analyses (step **1012**).

[074] If the current monthly income is less than or equal to zero, analysis component **706** calculates an average monthly income for the previous six reporting periods (step **1004**). If the average monthly income is greater than zero (step **1006**), analysis component **706** does not generate an exception, and proceeds with additional analyses (step **1012**).

[075] If the average monthly income is less than zero (step **1006**), component **706** divides the current excess net capital by the average monthly income (step **1008**) to estimate the number of months the authorized entity can continue business operations before depleting excess net capital. Component **706** then generates an exception message (step **1010**) such as "3.2 months to deplete excess net capital."

[076] Figure 17 is a flow diagram of a method, consistent with the present invention, to identify any misclassification of non-allowable assets by an authorized entity. Analysis component **706** compares current reporting period "Allowable" asset data to "Non-allowable" asset data from prior reporting periods (step **1102**). From this comparison, analysis component **706** determines whether assets have been misclassified (step **1104**). For example, if assets identified as "Allowable" in the current reporting period are identified as "Non-allowable" in the prior reporting period, analysis component **706** generates an exception report

(step **1106**), such as “Field label _____ was treated as ‘Non-Allowable’ in prior reporting period.” If there are no misclassified assets, analysis component **706** does not generate an exception.

[077] Figure 18 is a flow diagram of a method, consistent with the present invention, to determine whether the current total liabilities are zero, and if so, to determine whether this is an anomaly for the authorized entity. First, analysis component **706** determines whether the current total liabilities are greater than zero (step **1202**). If so, component **706** generates no exception and performs additional analyses (step **1210**).

[078] If the current liabilities are not greater than zero, analysis component **706** compares the current total liabilities reported by the authorized entity to the total liabilities from the most-recent prior reporting period (step **1204**). If the total liabilities for the most recent prior reporting period are also not greater than zero (step **1206**), analysis component **706** generates no exception and performs additional analyses (step **1210**). If, on the other hand, the total liabilities for the most recent prior reporting period are greater than zero (step **1206**), then analysis component **706** generates an exception report (step **1208**) such as “no liabilities accrued for current reporting period.”

[079] Figure 19 is a flow diagram of a method consistent with the present invention to determine whether the authorized entity has identified a new revenue type. First, analysis component **706** compares the categories for which revenue was reported to the categories for which revenue was reported in the most recent prior reporting period (step **1302**). In one embodiment, analysis component **706** compares Total Securities Commissions, Total Gains (or Losses), Total Realized and Unrealized Gains (or Losses), Profits (or Losses) from Underwriting and Selling Groups, and Other Revenue for current reporting period to the same revenue categories for prior reporting period. Using that comparison, analysis component **706** determines whether there is revenue in a new category (step **1304**). If there are no differences between the current and previous reporting period in which categories revenue was reported, analysis component **706**

generates no exception and performs additional analyses (step **1310**).

[080] If any of the current revenue categories were not present in the most recent reporting period filing, analysis component **706** compares each new revenue category value to the current reporting period filing's total revenue (step **1306**). If each new revenue category value does not exceed a specified threshold percentage of the total revenue for the current reporting period, analysis component **706** generates no exception and performs additional analyses. (step **1310**). If, however, any new revenue category value is greater than the threshold percentage of the value of total revenue for the current reporting period, analysis component **706** generates an exception (step **1308**) that identifies the new revenue type.

[081] Figure 20 is a flow diagram of a method, consistent with the present invention, to determine whether the equity data reported by the authorized entity reconciles. First, the system adds the current net income (step **1402**) to the total ownership equity from the last reporting period. If the resulting value of that calculation is equal to the current total ownership equity (step **1404**), analysis component **706** generates no exception and the analysis concludes (step **1408**). However, if the resulting value of that calculation is not equal to the total ownership equity of the current period, analysis component **706** generates an exception (step **1406**).

[082] The report-generation component **708** provides information about the analysis performed on data received from authorized entities. For example, the report generation component provides information about exceptions generated during the analysis of the data received from authorized entities. The reports generated can be standardized to provide predetermined data relating to the analysis. Alternatively, the reports generated can be customized to include user-defined results of the analysis. For example, depending on the criteria chosen for the report generation, reports can be generated that include information and data related to exceptions of a particular type or for exceptions during a particular time period. In another example, customized reports can be

created by specifying the data to include in the report using a variety of criteria including the review or filing period, name or identifier of an authorized entity, exception type, status of exception, or any combination thereof.

[083] Figure 21 is an example of a screenshot consistent with the present invention that provides a summary report of exceptions in a system. The summary table provides the exception type, the name of the authorized entity, the review (filing) period, a description of the exception, the date that the exception was generated, the filing date, the status, the analyst responsible for the exception, and comments. The exceptions displayed in the summary report of exceptions are determined by the criteria used to generate the report. Using an interface such as that shown in Figure 21, the criteria for generating the summary of exceptions may be specified using drop-down menus near the top of the screen. Here, the user may select the exception type, authorized entity, review period, exception status and/or assigned analyst. The summary of exceptions screen shown in Figure 21 also includes a "View Exception Details" button that provides the analyst with more in-depth detailed information regarding the reason that a specific exception was generated along with the data in question.

[084] Figure 22 is a screen shot of an exemplary exception report consistent with the present invention. This example shows a display of the details of an exception generated because an authorized entity's additions/deductions to the firm's capital do not reconcile. In general, the information displayed through "View Exception Details" provides additional detail and context regarding the exception. The information indicates the reasons for the exception, the contact information for the authorized entity, and, if applicable to the exception, the historical information relied upon in determining the generation of the exception.

[085] Each exception generated during analysis has information associated with it. For example, each exception may have associated with it an exception type, an identifier or name of the authorized entity, the review (filing) period, a description of the exception, the date that the exception was generated, the filing date, the status of the exception, the analyst responsible for the exception, and comments relating to the exception. This information can be used

to track the exception, to keep records, and to avoid duplication of effort by other analysts. For example, some exception types may require regulatory staff (an analyst) to perform additional tasks such as contacting the authorized entity to gain additional information.

[086] The "Status," "Analyst," and "Comments" information associated with an exception can be used to track of the status the exception, is the entity responsible for it, and the action taken. Referring again to Figure 21, the summary of exceptions report screen displays information associated with each exception. The "Status" field for the listed exceptions indicates what action, if any, is currently being taken with regard to a particular exception. For example, the status can be pending, under review, on hold, or resolved. The "Analyst" field identifies the analyst responsible for the particular exception, and the "Comments" field records any notes or comments about the exception including what actions have been taken toward investigating or resolving the exception. For example, a user can change the status, update the responsible analyst information, and add comments to reflect the current status, responsible analyst, and actions taken relating to the exception. By maintaining the information about the status, responsible analyst, and comments associated with each exception, analyst resources can be focused on pending exceptions and duplication of effort can be avoided. For example, as described above, a report can be created to identify all exceptions with a status of "pending" or all exceptions that are not assigned to an analyst.

[087] Systems consistent with the present invention can be easily configured to use a particular set of capital-adequacy rules. Such customization allows the system to be implemented in a variety of different markets that may have different capital-adequacy rules without extensive reprogramming. Similarly, an easily configurable system can be modified to reflect changes to the capital-adequacy rules of the particular market.

[088] Systems and methods consistent with the present invention do not depend on any specific mechanism. Such mechanisms can include selecting analysis rules from a library of existing analysis rules, creating rules using a rules

generator, or changing thresholds and other numerical values of existing analysis rules.

[089] A CAFA system and method consistent with the present invention may include a library of preprogrammed analysis rules. A user may select one or more analysis rules from the library that the CAFA then uses for determining capital-adequacy rules.

[090] Figure 23 shows one example of a process for configuring a CAFA system consistent with the present invention. Initially, a regulatory analyst reads and interprets existing statutes or rules regarding required capital for authorized entities (step **1502**). Next, the regulatory analyst accesses the analysis rules library (step **1504**). Then, the analyst selects those analysis-rules that most appropriately determine reflect the interpreted rules or statutes (step **1506**). Finally, the selected rules are implemented to analyze financial data received from authorized entities to determine compliance with capital-adequacy rules (step **1508**).

[091] Alternatively, the regulatory analyst can create custom analysis rules to analyze data to determine compliance with capital-adequacy rules. In such an embodiment, a regulatory analyst uses a conventional rules generator to create custom analysis rules. The rules generator may be any type including commercially available business rules management software. In one example, the rules generator provides a list of data quantities collected from authorized entities and a list of operations that can be performed on the data. A regulatory analyst can build custom analysis rules by selecting data quantities and operators.

[092] Figure 24 illustrates an example of a rules-generator selection screen. This example shows two lists: an available data list **1604**; and an operations list **1602**. Figure 24 also shows a rule-building area **1606**. Here, a regulatory analyst may select available data and operators from the lists and drag them to the rule-building area **1606**. The analyst may also use a keyboard to enter numerical values as part of the rule-generation process. By arranging the

available data, operations, and numerical values in the rule building area, the analyst constructs analysis rules. For example, a regulatory analyst could select and drag available data and operations to the rule building area to construct a rule to determine whether the equity data reported by the authorized entity reconciles. Such a rule might have the following form:

IF (Prior Total Ownership Equity + Net Income Value) \neq Current Total
Ownership Equity THEN Generate Exception

The analysis rules may also be customizable by changing numerical values in existing analysis rules. For example, an analyst can adjust the thresholds in the analysis rules to tailor existing analysis rules to new markets with different capital-adequacy rules, or to adjust existing analysis rules when the capital adequacy rules within a market change.

[093] Figure 25 is an exemplary screen shot of a threshold-adjustment feature consistent with the present invention. The screen shot displays a description of each threshold along with the current value of the threshold. Using this screen shot, an analyst can change the value of the threshold by overwriting the displayed value and selecting the Update/Save button.

[094] In one example of a CAFA system consistent with the present invention, the analysis rules may be identified using any one or combination of: preprogrammed analysis rules; rules selected from a library of existing analysis rules; and analysis rules created using a rules generator. A CAFA system consistent with the disclosed invention can allow numerical values and thresholds used in any of these analysis rules to be adjusted using any appropriate methods.

[095] Systems and methods consistent with the present invention are not limited to the embodiments shown. For example, the CAFA system can include a reporting function that allows users to query the database to extract any information about authorized entities of interest. In addition, users can use standard software to chart the stored data to provide graphical reports. As another alternative, the users can customize the forms themselves so that the forms can evolve as well as the rules. Also, although the implementations discussed are WindowsTM-based, they could be web-based, or used any other

acceptable software,

[096] Other embodiments of the invention will be apparent to those skilled in the art from consideration of the specification and practice of the invention disclosed herein. It is intended that the specification and examples be considered as exemplary only, with a true scope and spirit of the invention being indicated by the following claims.

WHAT IS CLAIMED IS:

1. An automatic method for determining compliance with capital-adequacy rules comprising:
 - configuring a set of analysis rules;
 - receiving, from an authorized entity at a data processing system, electronic financial data relevant to the capital of an authorized entity;
 - analyzing the received financial data by the data processing system using the configured analysis rules to determine whether the capital of the authorized entity is in compliance with the capital-adequacy rules;
 - and
 - providing a notification of noncompliance when the capital of the authorized entity is not in compliance with the capital adequacy rules.
2. The method of claim 1, wherein configuring the set of analysis rules includes selecting the analysis rules from a library of analysis rules.
3. The method of claim 1, configuring the set of analysis rules includes creating the analysis rules using a rules generator.
4. The method of claim 1, wherein configuring the set of analysis rules includes designating a threshold value for the analysis rules.
5. The method of claim 1, wherein analyzing the received data includes determining whether an existing net capital of the authorized entity is greater than a required net capital for the authorized entity.
6. The method of claim 1 wherein analyzing the received data includes determining an erosion of excess net capital.
7. The method of claim 6, wherein determining an erosion of net capital includes calculating excess net capital for a current period and a prior period; and comparing the excess net capital value for the current period with the excess net capital value for the previous reporting period to see if

there is a loss of excess net capital greater than a predetermined threshold.

8. The method of claim 1, wherein analyzing the received data includes determining whether an authorized entity is experiencing losses.
9. The method of claim 8, wherein analyzing the received data further includes determining the rate of losses if the authorized entity is experiencing losses
10. The method of claim 9, wherein determining the rate of losses includes determining an average monthly income for at least one previous reporting period; and
dividing the current excess net capital by the average monthly income if the average monthly income is negative to estimate the time for the authorized entity to deplete excess net capital.
11. The method of claim 1, wherein analyzing the received data includes determining whether the authorized entity has identified a new revenue type.
12. The method of claim 1, wherein the received data includes equity data, and wherein analyzing the received data includes determining whether the equity data reported by the authorized entity reconciles.
13. The method of claim 12, wherein determining whether the equity data reported by the authorized entity reconciles includes adding data representing the current net income to data representing the total ownership equity from a prior reporting period; and determining whether the resulting sum equals data representing the current total ownership equity.
14. The method of claim 1, wherein receiving the electronic financial data includes receiving data required to be filed with a regulatory authority.
15. The method of claim 1, wherein analyzing the received data includes generating an exception condition if the authorized entity does not comply

with capital-adequacy rules.

16. The method of claim 15, wherein analyzing the received data further includes associating information relating to the exception with the generated exception.
17. The method of claim 16, wherein the associated information includes a status of the exception.
18. The method of claim 16, wherein the associated information includes an identifier of an analyst responsible for the exception.
19. The method of claim 16, wherein the associated information includes a record of actions taken relating to the exception.
20. The method of claim 16, further including tracking the exception using the information associated with the exception.
21. The method of claim 1, wherein providing a notification includes generating a report with the results of the analysis.
22. The method of claim 21, wherein the report is customized to include user-designated results.
23. The method of claim 1, wherein receiving electronic financial data includes receiving electronic forms that include financial data.

24. A capital-adequacy filing and assessment system for determining compliance with capital-adequacy rules comprising:
an authorized-entity computer; and
a processing computer in electronic communication with the authorized-entity computer including
an analysis rule configuration component that configures analysis rules for analyzing financial data relating to capital-adequacy rules,
a data reception component for receiving financial data relating to capital-adequacy rules from the authorized-entity computer, and
a rules engine to analyze the financial data relating to capital-adequacy rules received from the authorized-entity computer using the analysis rules configured by the analysis configuration component.
25. The capital-adequacy filing and assessment system of claim 24, wherein the analysis rule configuration component configures analysis rules by selecting an analysis rule from a library of analysis rules.
26. The capital-adequacy filing and assessment system of claim 24, wherein the analysis rule configuration component configures analysis rules using a rules generator to create analysis rules.
27. The capital-adequacy filing and assessment system of claim 24, wherein the analysis rule configuration component configures analysis rules by designating a threshold value for use in an analysis rule.
28. The capital-adequacy filing and assessment system of claim 24, wherein the analysis rules include threshold values configurable by a user.
29. The capital-adequacy filing and assessment system of claim 24, wherein the analysis rules are based on capital-adequacy rules set by a regulatory body.

30. The capital-adequacy filing and assessment system of claim 24, wherein the analysis rules determine whether an existing net capital of an authorized entity is greater than a required net capital for the authorized entity.
31. The capital-adequacy filing and assessment system of claim 24, wherein the financial data received by the data reception component from the authorized-entity computer includes data to be filed with a regulatory authority.
32. The capital-adequacy filing and assessment system of claim 24, wherein the rules engine generates an exception condition if the financial data does not comply with capital-adequacy rules.
33. The capital-adequacy filing and assessment system of claim 32, wherein the exception is associated with information relating to the exception.
34. The capital-adequacy filing and assessment system of claim 33, wherein the information comprises a status of the exception.
35. The capital-adequacy filing and assessment system of claim 34, wherein the information includes an identifier of an analyst responsible for the exception.
36. The capital-adequacy filing and assessment system of claim 35, wherein the information includes a record of actions taken relating to the exception.
37. The capital-adequacy filing and assessment system of claim 24, further comprising
 - a report generation component for generating a report with a result of analysis performed by the rules engine of the financial data relating to capital-adequacy rules.
38. The capital-adequacy filing and assessment system of claim 37, wherein the report is customized to include user-designated results.
39. The capital-adequacy filing and assessment system of claim 24, wherein the financial data relating to capital-adequacy rules received by the data reception component from an authorized-entity computer includes electronic forms that include financial data.
40. The capital-adequacy filing and assessment system of claim 24, wherein the

rules engine determines an erosion of excess net capital.

41. The capital-adequacy filing and assessment system of claim 40, wherein the rules engine calculates excess net capital for a current period and a prior period; and compares the excess net capital value for the current period with the excess net capital value for the previous reporting period to see if there is a loss of excess net capital greater than a predetermined threshold.
42. The capital-adequacy filing and assessment system of claim 24, wherein the rules engine determines whether an authorized entity is experiencing losses.
43. The capital-adequacy filing and assessment system of claim 42, wherein the rules engine determines the rate of losses if the authorized entity is experiencing losses
44. The capital-adequacy filing and assessment system of claim 43, wherein the rules engine determines an average monthly income for at least one previous reporting period; and divides the current excess net capital by the average monthly income if the average monthly income is negative to estimate the time for the authorized entity to deplete excess net capital.
45. The capital-adequacy filing and assessment system of claim 24, wherein the rules engine determines whether the authorized entity has identified a new revenue type.
46. The capital-adequacy filing and assessment system of claim 24, wherein the received data includes equity data, and wherein the rules engine determines whether the equity data reported by the authorized entity reconciles.
47. The capital-adequacy filing and assessment system of claim 24, wherein the rules engine adds data representing the current net income to data representing the total ownership equity from a prior reporting period; and determines whether the resulting sum equals data representing the current total ownership equity.

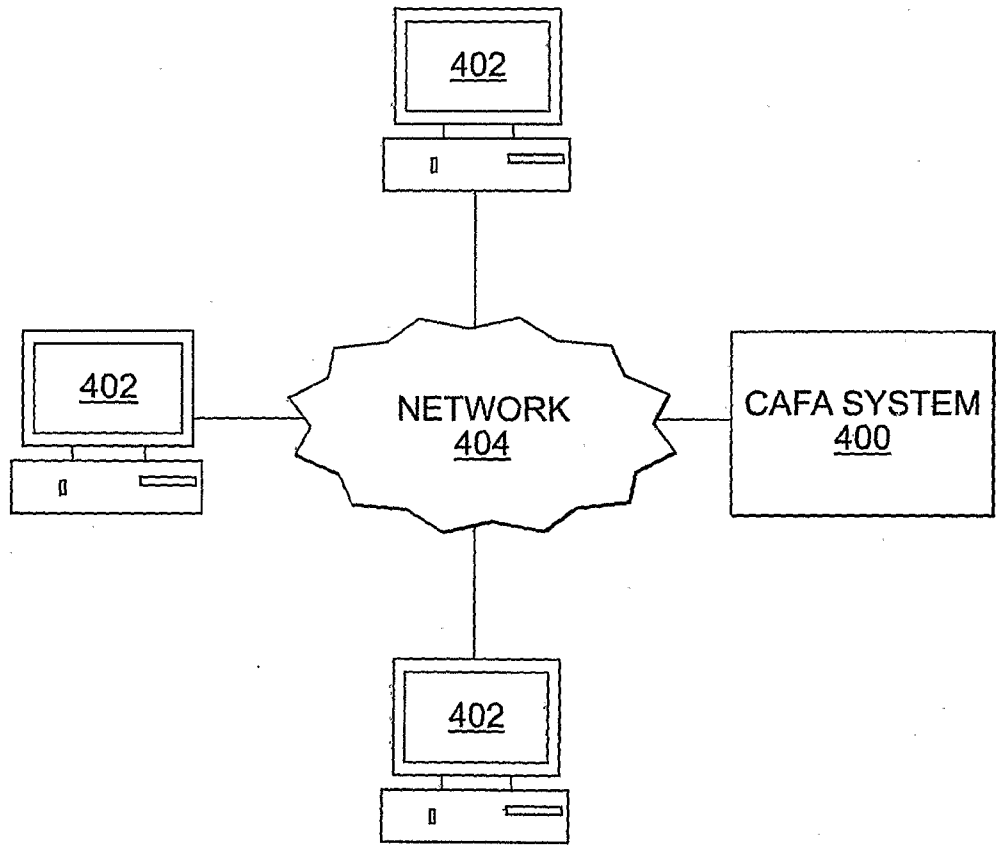


FIG. 1

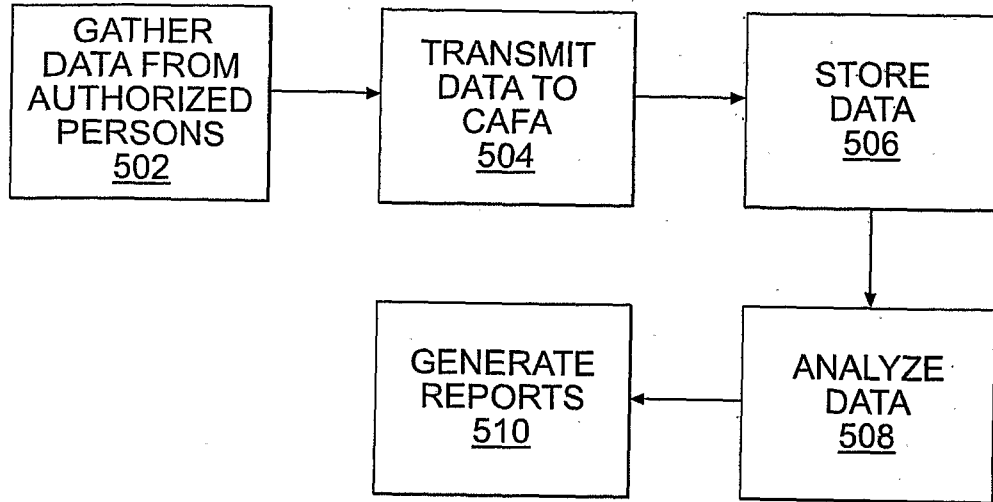


FIG. 2

CAFA FORMS
FILE DATA HELP
<u>General Information</u>
<u>Assets</u>
<u>Liabilities</u>
<u>Ownership Equity</u>
<u>Income Statement</u>
<u>Net Capital</u>
<u>Net Capital Requirements</u>

FIG. 3

CAFA FORMS FILE DATA HELP

General Information Assets Liabilities Ownership Equity Income Statement Net Capital Net Capital Requirements

GENERAL INFORMATION
*denotes required field

AUTHORISED PERSON NAME*: [] PREPARER*: []

TELEPHONE NUMBER*:
COUNTRY CODE: [966] CITYCODE: [1] NUMBER []

FAX NUMBER*:
COUNTRY CODE: [966] CITYCODE: [1] NUMBER []

E-MAIL ADDRESS*: [] REVIEW PERIOD*: [REVIEW PERIOD]

BUSINESS ACTIVITY*(CHOOSE ONE)
 DEALING AS PRINCIPAL, AGENT, IN CUSTODY, OR IN UNDERWRITING
 MANAGING INVESTMENT FUNDS OR OTHER CLIENT PORTFOLIOS
 ARRANGING
 ADVISING

ADDRESS: []
CITY: [] COUNTRY: []
POSTAL CODE: []

CURRENT DATE/TIME [6/2/2005 3:52:44 PM]
(SYSTEM GENERATED)

START

FIG. 4

CAFA FORMS																																																																							
FILE DATA HELP																																																																							
<p><u>General Information</u></p> <p>Assets</p> <p><u>Liabilities</u></p> <p><u>Ownership Equity</u></p> <p><u>Income Statement</u></p> <p><u>Net Capital</u></p> <p><u>Net Capital Requirements</u></p>	<p>ASSETS</p> <table border="1"> <thead> <tr> <th></th> <th>ALLOWABLE</th> <th>NON-ALLOWABLE</th> <th>TOTAL</th> </tr> </thead> <tbody> <tr> <td>1. CASH</td> <td>1a <input type="text" value="0"/></td> <td>1b <input type="text" value="0"/></td> <td>1c <input type="text" value="0"/></td> </tr> <tr> <td>2. CASH SEGREGATED IN COMPLIANCE WITH FEDERAL AND OTHER REGULATIONS</td> <td>2a <input type="text" value="0"/></td> <td>2b <input type="text" value="0"/></td> <td>2c <input type="text" value="0"/></td> </tr> <tr> <td colspan="4">RECEIVABLE FROM BROKERS OR DEALERS AND CLEARING ORGANIZATIONS</td> </tr> <tr> <td>4. FAILED TO DELIVER</td> <td>4a <input type="text" value="0"/></td> <td>4b <input type="text" value="0"/></td> <td>4c <input type="text" value="0"/></td> </tr> <tr> <td>5. SECURITIES BORROWED</td> <td>5a <input type="text" value="0"/></td> <td>5b <input type="text" value="0"/></td> <td>5c <input type="text" value="0"/></td> </tr> <tr> <td>6. OMNIBUS ACCOUNTS</td> <td>6a <input type="text" value="0"/></td> <td>6b <input type="text" value="0"/></td> <td>6c <input type="text" value="0"/></td> </tr> <tr> <td>7. OMNIBUS ACCOUNTS</td> <td>7a <input type="text" value="0"/></td> <td>7b <input type="text" value="0"/></td> <td>7c <input type="text" value="0"/></td> </tr> <tr> <td>8. OTHER ...</td> <td>8a <input type="text" value="0"/></td> <td>8b <input type="text" value="0"/></td> <td>8c <input type="text" value="0"/></td> </tr> <tr> <td>9. RECEIVABLES FROM CUSTOMERS</td> <td>9a <input type="text" value="0"/></td> <td>9b <input type="text" value="0"/></td> <td>9c <input type="text" value="0"/></td> </tr> <tr> <td>10. SECURITIES ACCOUNTS</td> <td>10a <input type="text" value="0"/></td> <td>10b <input type="text" value="0"/></td> <td>10c <input type="text" value="0"/></td> </tr> <tr> <td>11. CASH AND FULLY SECURED ACCOUNTS</td> <td>11a <input type="text" value="0"/></td> <td>11b <input type="text" value="0"/></td> <td>11c <input type="text" value="0"/></td> </tr> <tr> <td>12. PARTLY SECURED ACCOUNTS</td> <td>12a <input type="text" value="0"/></td> <td>12b <input type="text" value="0"/></td> <td>12c <input type="text" value="0"/></td> </tr> <tr> <td>13. UNSECURED ACCOUNTS</td> <td>13a <input type="text" value="0"/></td> <td>13b <input type="text" value="0"/></td> <td>13c <input type="text" value="0"/></td> </tr> <tr> <td>14. COMMODITIES ACCOUNTS</td> <td>14a <input type="text" value="0"/></td> <td>14b <input type="text" value="0"/></td> <td>14c <input type="text" value="0"/></td> </tr> <tr> <td>15. ALLOWANCE FOR DOUBTFUL ACCOUNTS</td> <td>15a <input type="text" value="0"/></td> <td>15b <input type="text" value="0"/></td> <td>15c <input type="text" value="0"/></td> </tr> <tr> <td>16. RECEIVABLES FROM NON-CUSTOMERS</td> <td>16a <input type="text" value="0"/></td> <td>16b <input type="text" value="0"/></td> <td>16c <input type="text" value="0"/></td> </tr> </tbody> </table>				ALLOWABLE	NON-ALLOWABLE	TOTAL	1. CASH	1a <input type="text" value="0"/>	1b <input type="text" value="0"/>	1c <input type="text" value="0"/>	2. CASH SEGREGATED IN COMPLIANCE WITH FEDERAL AND OTHER REGULATIONS	2a <input type="text" value="0"/>	2b <input type="text" value="0"/>	2c <input type="text" value="0"/>	RECEIVABLE FROM BROKERS OR DEALERS AND CLEARING ORGANIZATIONS				4. FAILED TO DELIVER	4a <input type="text" value="0"/>	4b <input type="text" value="0"/>	4c <input type="text" value="0"/>	5. SECURITIES BORROWED	5a <input type="text" value="0"/>	5b <input type="text" value="0"/>	5c <input type="text" value="0"/>	6. OMNIBUS ACCOUNTS	6a <input type="text" value="0"/>	6b <input type="text" value="0"/>	6c <input type="text" value="0"/>	7. OMNIBUS ACCOUNTS	7a <input type="text" value="0"/>	7b <input type="text" value="0"/>	7c <input type="text" value="0"/>	8. OTHER ...	8a <input type="text" value="0"/>	8b <input type="text" value="0"/>	8c <input type="text" value="0"/>	9. RECEIVABLES FROM CUSTOMERS	9a <input type="text" value="0"/>	9b <input type="text" value="0"/>	9c <input type="text" value="0"/>	10. SECURITIES ACCOUNTS	10a <input type="text" value="0"/>	10b <input type="text" value="0"/>	10c <input type="text" value="0"/>	11. CASH AND FULLY SECURED ACCOUNTS	11a <input type="text" value="0"/>	11b <input type="text" value="0"/>	11c <input type="text" value="0"/>	12. PARTLY SECURED ACCOUNTS	12a <input type="text" value="0"/>	12b <input type="text" value="0"/>	12c <input type="text" value="0"/>	13. UNSECURED ACCOUNTS	13a <input type="text" value="0"/>	13b <input type="text" value="0"/>	13c <input type="text" value="0"/>	14. COMMODITIES ACCOUNTS	14a <input type="text" value="0"/>	14b <input type="text" value="0"/>	14c <input type="text" value="0"/>	15. ALLOWANCE FOR DOUBTFUL ACCOUNTS	15a <input type="text" value="0"/>	15b <input type="text" value="0"/>	15c <input type="text" value="0"/>	16. RECEIVABLES FROM NON-CUSTOMERS	16a <input type="text" value="0"/>	16b <input type="text" value="0"/>	16c <input type="text" value="0"/>
	ALLOWABLE	NON-ALLOWABLE	TOTAL																																																																				
1. CASH	1a <input type="text" value="0"/>	1b <input type="text" value="0"/>	1c <input type="text" value="0"/>																																																																				
2. CASH SEGREGATED IN COMPLIANCE WITH FEDERAL AND OTHER REGULATIONS	2a <input type="text" value="0"/>	2b <input type="text" value="0"/>	2c <input type="text" value="0"/>																																																																				
RECEIVABLE FROM BROKERS OR DEALERS AND CLEARING ORGANIZATIONS																																																																							
4. FAILED TO DELIVER	4a <input type="text" value="0"/>	4b <input type="text" value="0"/>	4c <input type="text" value="0"/>																																																																				
5. SECURITIES BORROWED	5a <input type="text" value="0"/>	5b <input type="text" value="0"/>	5c <input type="text" value="0"/>																																																																				
6. OMNIBUS ACCOUNTS	6a <input type="text" value="0"/>	6b <input type="text" value="0"/>	6c <input type="text" value="0"/>																																																																				
7. OMNIBUS ACCOUNTS	7a <input type="text" value="0"/>	7b <input type="text" value="0"/>	7c <input type="text" value="0"/>																																																																				
8. OTHER ...	8a <input type="text" value="0"/>	8b <input type="text" value="0"/>	8c <input type="text" value="0"/>																																																																				
9. RECEIVABLES FROM CUSTOMERS	9a <input type="text" value="0"/>	9b <input type="text" value="0"/>	9c <input type="text" value="0"/>																																																																				
10. SECURITIES ACCOUNTS	10a <input type="text" value="0"/>	10b <input type="text" value="0"/>	10c <input type="text" value="0"/>																																																																				
11. CASH AND FULLY SECURED ACCOUNTS	11a <input type="text" value="0"/>	11b <input type="text" value="0"/>	11c <input type="text" value="0"/>																																																																				
12. PARTLY SECURED ACCOUNTS	12a <input type="text" value="0"/>	12b <input type="text" value="0"/>	12c <input type="text" value="0"/>																																																																				
13. UNSECURED ACCOUNTS	13a <input type="text" value="0"/>	13b <input type="text" value="0"/>	13c <input type="text" value="0"/>																																																																				
14. COMMODITIES ACCOUNTS	14a <input type="text" value="0"/>	14b <input type="text" value="0"/>	14c <input type="text" value="0"/>																																																																				
15. ALLOWANCE FOR DOUBTFUL ACCOUNTS	15a <input type="text" value="0"/>	15b <input type="text" value="0"/>	15c <input type="text" value="0"/>																																																																				
16. RECEIVABLES FROM NON-CUSTOMERS	16a <input type="text" value="0"/>	16b <input type="text" value="0"/>	16c <input type="text" value="0"/>																																																																				

FIG. 5

CAFA FORMS																																																																										
FILE DATA HELP																																																																										
<table border="1"> <tr><td>General Information</td></tr> <tr><td>Assets</td></tr> <tr><td>Liabilities</td></tr> <tr><td>Ownership Equity</td></tr> <tr><td>Income Statement</td></tr> <tr><td>Net Capital</td></tr> <tr><td>Net Capital Requirements</td></tr> </table>	General Information	Assets	Liabilities	Ownership Equity	Income Statement	Net Capital	Net Capital Requirements	<p>LIABILITIES</p> <table border="1"> <thead> <tr> <th></th> <th>A.I. LIABILITIES</th> <th>NON-A.I. LIABILITIES</th> <th>TOTAL</th> </tr> </thead> <tbody> <tr> <td>55. BANK LOANS PAYABLE</td> <td>55a <input type="text" value="0"/></td> <td>55b <input type="text" value="0"/></td> <td>55c <input type="text" value="0"/></td> </tr> <tr> <td>56. SECURITIES SOLD UNDER REPURCHASE AGREEMENTS</td> <td>56a <input type="text" value="0"/></td> <td>56b <input type="text" value="0"/></td> <td>56c <input type="text" value="0"/></td> </tr> <tr> <td colspan="4">PAYABLE TO BROKERS OR DEALERS AND CLEARING ORGANIZATIONS</td> </tr> <tr> <td>58. FAILED TO RECEIVE</td> <td>58a <input type="text" value="0"/></td> <td>58b <input type="text" value="0"/></td> <td>58c <input type="text" value="0"/></td> </tr> <tr> <td>59. SECURITIES LOANED</td> <td>59a <input type="text" value="0"/></td> <td>59b <input type="text" value="0"/></td> <td>59c <input type="text" value="0"/></td> </tr> <tr> <td>60. OMNIBUS ACCOUNTS</td> <td>60a <input type="text" value="0"/></td> <td>60b <input type="text" value="0"/></td> <td>60c <input type="text" value="0"/></td> </tr> <tr> <td>61. CLEARING ORGANIZATIONS</td> <td>61a <input type="text" value="0"/></td> <td>61b <input type="text" value="0"/></td> <td>61c <input type="text" value="0"/></td> </tr> <tr> <td>62. PAYABLE TO CUSTOMERS</td> <td>62a <input type="text" value="0"/></td> <td>62b <input type="text" value="0"/></td> <td>62c <input type="text" value="0"/></td> </tr> <tr> <td>63. SECURITIES ACCOUNTS INCLUDING FREE CREDITS OF</td> <td>63a <input type="text" value="0"/></td> <td>63b <input type="text" value="0"/></td> <td>63c <input type="text" value="0"/></td> </tr> <tr> <td>64. COMMODITIES ACCOUNTS</td> <td>64a <input type="text" value="0"/></td> <td>64b <input type="text" value="0"/></td> <td>64c <input type="text" value="0"/></td> </tr> <tr> <td colspan="4">PAYABLE TO NON-CUSTOMERS</td> </tr> <tr> <td>66. SECURITIES ACCOUNTS</td> <td>66a <input type="text" value="0"/></td> <td>66b <input type="text" value="0"/></td> <td>66c <input type="text" value="0"/></td> </tr> <tr> <td>67. COMMODITIES ACCOUNTS</td> <td>67a <input type="text" value="0"/></td> <td>67b <input type="text" value="0"/></td> <td>67c <input type="text" value="0"/></td> </tr> <tr> <td>71. SECURITIES/COMMODITIES SOLD NOT YET PURCHASED AT MARKET VALUE INCLUDING ARBITRAGE OF ACCOUNTS</td> <td></td> <td>71b <input type="text" value="0"/></td> <td>71c <input type="text" value="0"/></td> </tr> <tr> <td colspan="4">ACCOUNTS PAYABLE AND ACCRUED LIABILITIES AND EXPENSES</td> </tr> </tbody> </table>				A.I. LIABILITIES	NON-A.I. LIABILITIES	TOTAL	55. BANK LOANS PAYABLE	55a <input type="text" value="0"/>	55b <input type="text" value="0"/>	55c <input type="text" value="0"/>	56. SECURITIES SOLD UNDER REPURCHASE AGREEMENTS	56a <input type="text" value="0"/>	56b <input type="text" value="0"/>	56c <input type="text" value="0"/>	PAYABLE TO BROKERS OR DEALERS AND CLEARING ORGANIZATIONS				58. FAILED TO RECEIVE	58a <input type="text" value="0"/>	58b <input type="text" value="0"/>	58c <input type="text" value="0"/>	59. SECURITIES LOANED	59a <input type="text" value="0"/>	59b <input type="text" value="0"/>	59c <input type="text" value="0"/>	60. OMNIBUS ACCOUNTS	60a <input type="text" value="0"/>	60b <input type="text" value="0"/>	60c <input type="text" value="0"/>	61. CLEARING ORGANIZATIONS	61a <input type="text" value="0"/>	61b <input type="text" value="0"/>	61c <input type="text" value="0"/>	62. PAYABLE TO CUSTOMERS	62a <input type="text" value="0"/>	62b <input type="text" value="0"/>	62c <input type="text" value="0"/>	63. SECURITIES ACCOUNTS INCLUDING FREE CREDITS OF	63a <input type="text" value="0"/>	63b <input type="text" value="0"/>	63c <input type="text" value="0"/>	64. COMMODITIES ACCOUNTS	64a <input type="text" value="0"/>	64b <input type="text" value="0"/>	64c <input type="text" value="0"/>	PAYABLE TO NON-CUSTOMERS				66. SECURITIES ACCOUNTS	66a <input type="text" value="0"/>	66b <input type="text" value="0"/>	66c <input type="text" value="0"/>	67. COMMODITIES ACCOUNTS	67a <input type="text" value="0"/>	67b <input type="text" value="0"/>	67c <input type="text" value="0"/>	71. SECURITIES/COMMODITIES SOLD NOT YET PURCHASED AT MARKET VALUE INCLUDING ARBITRAGE OF ACCOUNTS		71b <input type="text" value="0"/>	71c <input type="text" value="0"/>	ACCOUNTS PAYABLE AND ACCRUED LIABILITIES AND EXPENSES			
General Information																																																																										
Assets																																																																										
Liabilities																																																																										
Ownership Equity																																																																										
Income Statement																																																																										
Net Capital																																																																										
Net Capital Requirements																																																																										
	A.I. LIABILITIES	NON-A.I. LIABILITIES	TOTAL																																																																							
55. BANK LOANS PAYABLE	55a <input type="text" value="0"/>	55b <input type="text" value="0"/>	55c <input type="text" value="0"/>																																																																							
56. SECURITIES SOLD UNDER REPURCHASE AGREEMENTS	56a <input type="text" value="0"/>	56b <input type="text" value="0"/>	56c <input type="text" value="0"/>																																																																							
PAYABLE TO BROKERS OR DEALERS AND CLEARING ORGANIZATIONS																																																																										
58. FAILED TO RECEIVE	58a <input type="text" value="0"/>	58b <input type="text" value="0"/>	58c <input type="text" value="0"/>																																																																							
59. SECURITIES LOANED	59a <input type="text" value="0"/>	59b <input type="text" value="0"/>	59c <input type="text" value="0"/>																																																																							
60. OMNIBUS ACCOUNTS	60a <input type="text" value="0"/>	60b <input type="text" value="0"/>	60c <input type="text" value="0"/>																																																																							
61. CLEARING ORGANIZATIONS	61a <input type="text" value="0"/>	61b <input type="text" value="0"/>	61c <input type="text" value="0"/>																																																																							
62. PAYABLE TO CUSTOMERS	62a <input type="text" value="0"/>	62b <input type="text" value="0"/>	62c <input type="text" value="0"/>																																																																							
63. SECURITIES ACCOUNTS INCLUDING FREE CREDITS OF	63a <input type="text" value="0"/>	63b <input type="text" value="0"/>	63c <input type="text" value="0"/>																																																																							
64. COMMODITIES ACCOUNTS	64a <input type="text" value="0"/>	64b <input type="text" value="0"/>	64c <input type="text" value="0"/>																																																																							
PAYABLE TO NON-CUSTOMERS																																																																										
66. SECURITIES ACCOUNTS	66a <input type="text" value="0"/>	66b <input type="text" value="0"/>	66c <input type="text" value="0"/>																																																																							
67. COMMODITIES ACCOUNTS	67a <input type="text" value="0"/>	67b <input type="text" value="0"/>	67c <input type="text" value="0"/>																																																																							
71. SECURITIES/COMMODITIES SOLD NOT YET PURCHASED AT MARKET VALUE INCLUDING ARBITRAGE OF ACCOUNTS		71b <input type="text" value="0"/>	71c <input type="text" value="0"/>																																																																							
ACCOUNTS PAYABLE AND ACCRUED LIABILITIES AND EXPENSES																																																																										

FIG. 6

CAFA FORMS
FILE DATA HELP

General Information
Assets
Liabilities
Ownership Equity
Income Statement
Net Capital
Net Capital Requirements

OWNERSHIP EQUITY

CORPORATION

92a. PREFERRED STOCK	92a	<input type="text" value="0"/>
92b. COMMON STOCK	92b	<input type="text" value="0"/>
92c. ADDITIONAL PAID-IN CAPITAL	92c	<input type="text" value="0"/>
92d. RETAINED EARNINGS	92d	<input type="text" value="0"/>
92e. TOTAL EQUITY	92e	<input type="text" value="0"/>
92f. LESS CAPITAL STOCK IN TREASURY	92f	<input type="text" value="0"/>
92g. OTHER FORMS OF OWNERSHIP EQUITY (PLEASE LIST ON ATTACHMENT)	92g	<input type="text" value="0"/>
92h. TOTAL OWNERSHIP EQUITY	92h	<input type="text" value="0"/>
92i. TOTAL OWNERSHIP EQUITY PLUS LIABILITIES	92i	<input type="text" value="0"/>

SAVE OWNERSHIP EQUITY INFORMATION

FIG. 7

CAFA FORMS	
FILE DATA HELP	
General Information	INCOME STATEMENT
Assets	REVENUE
Liabilities	COMMISSIONS
Ownership Equity	100a. COMMISSIONS ON TRANSACTIONS IN EXCHANGE LISTED EQUITY SECURITIES EXECUTED ON AN EXCHANGE 100a <input type="text" value="0"/>
Income Statement	100b. COMMISSIONS ON TRANSACTIONS IN EXCHANGE LISTED EQUITY SECURITIES EXECUTED OVER-THE-COUNTER 100b <input type="text" value="0"/>
Net Capital	100c. COMMISSIONS ON LISTED OPTIONS TRANSACTIONS 100c <input type="text" value="0"/>
Net Capital Requirements	100d. ALL OTHER SECURITIES COMMISSIONS 100d <input type="text" value="0"/>
	100e. TOTAL SECURITIES COMMISSIONS 100e <input type="text" value="0"/>
	GAINS OR LOSSES ON FIRM SECURITIES TRADING ACCOUNTS
	110a. FROM MARKET MAKING IN OVER-THE-COUNTER EQUITY SECURITIES 110a <input type="text" value="0"/>
	110b. FROM TRADING IN DEBT SECURITIES 110b <input type="text" value="0"/>
	110c. FROM ALL OTHER TRADING 110c <input type="text" value="0"/>
	GAINS OR LOSSES ON FIRM SECURITIES INVESTMENT ACCOUNTS
	112a. INCLUDES REALIZED GAINS (LOSSES) 112a <input type="text" value="0"/>
	112b. INCLUDES UNREALIZED GAINS (LOSSES) 112b <input type="text" value="0"/>
	112d. TOTAL REALIZED OR UNREALIZED GAINS (OR LOSSES) 112d <input type="text" value="0"/>
	114. PROFITS (LOSSES) FROM UNDERWRITING AND SELLING GROUPS 114a <input type="text" value="0"/>

FIG. 8

CAFA FORMS	
FILE DATA HELP	
General Information	NET CAPITAL DATA ENTRY
Assets	155. TOTAL OWNERSHIP EQUITY FROM STATEMENT OF FINANCIAL CONDITION 155a <input type="text" value="0"/>
Liabilities	156. DEDUCT OWNERSHIP EQUITY NOT ALLOWABLE FOR NET CAPITAL (INCLUDING ANY EQUITY INSTRUMENT FOR WHICH THE HOLDER/INVESTOR HAS A RIGHT OF REDEMPTION) 156a <input type="text" value="0"/>
Ownership Equity	157. TOTAL OWNERSHIP EQUITY QUALIFIED FOR NET CAPITAL 157a <input type="text" value="0"/>
Income Statement	158. LIABILITIES SUBORDINATED TO CLAIMS OF GENERAL CREDITORS ALLOWABLE IN COMPUTATION OF NET CAPITAL 158a <input type="text" value="0"/>
Net Capital	159. OTHER DEDUCTIONS OR ALLOWABLE CREDITS (PLEASE LIST ON ATTACHMENT) <input type="button" value="..."/> 159a <input type="text" value="0"/>
Net Capital Requirements	160. TOTAL CAPITAL AND ALLOWABLE SUBORDINATED LIABILITIES 160a <input type="text" value="0"/>
	165. DEDUCTIONS AND/OR CHARGES 165a <input type="text" value="0"/>
	166. TOTAL NON-ALLOWABLE ASSETS FROM STATEMENT OF FINANCIAL CONDITION 166a <input type="text" value="0"/>
	167. MARKET VALUE OF ALL SHORT SECURITY DIFFERENCES 167a <input type="text" value="0"/>
	168. OPERATIONAL CHARGES RELATING TO SUSPENSE OR RECONCILING DIFFERENCES 168a <input type="text" value="0"/>
	170. NET CAPITAL BEFORE MARKET RISK CHARGES ON SECURITIES POSITIONS 170a <input type="text" value="0"/>
	172. DEBT SECURITIES ISSUED OR GUARANTEED AS TO PRINCIPAL BY AN OECD MEMBER, LOCALBANK, OR CORPORATE OR MUNICIPAL ENTITY DOMICILED IN AN OECD COUNTRY WITH A RATING OF BBB+ OR HIGHER 172a <input type="text" value="0"/>
	173. CERTAIN MUTUAL FUNDS AND LIQUID ASSET FUNDS 173a <input type="text" value="0"/>
	174. CONVERTIBLE DEBT SECURITIES 174a <input type="text" value="0"/>
	175. PREFERRED STOCK 175a <input type="text" value="0"/>

FIG. 9

CAFA FORMS	
FILE DATA HELP	
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
<u>General Information</u>	NET CAPITAL REQUIREMENTS COMPUTATION
<u>Assets</u>	BUSINESS ACTIVITY (FROM GENERAL INFORMATION PAGE) 300b <input type="text"/>
<u>Liabilities</u>	INITIAL VALUE 300c <input type="text"/>
<u>Ownership Equity</u>	BASELINE VALUE 300a <input type="text"/>
<u>Income Statement</u>	TOTAL MONIES OWED TO AUTHORISED PERSON IN EXCESS OF 50% OF NET CAPITAL 320a <input type="text"/>
<u>Net Capital</u>	
<u>Net Capital Requirements</u>	REQUIRED NET CAPITAL 330a <input type="text"/>
	ACTUAL NET VALUE (ITEM 182a) 340a <input type="text"/>
	EXCESS NET CAPITAL 350a <input type="text"/>
	<div style="border: 1px solid black; padding: 5px; display: inline-block;">SAVE NET REQUIREMENTS CALCULATION INFORMATION</div>

FIG. 10

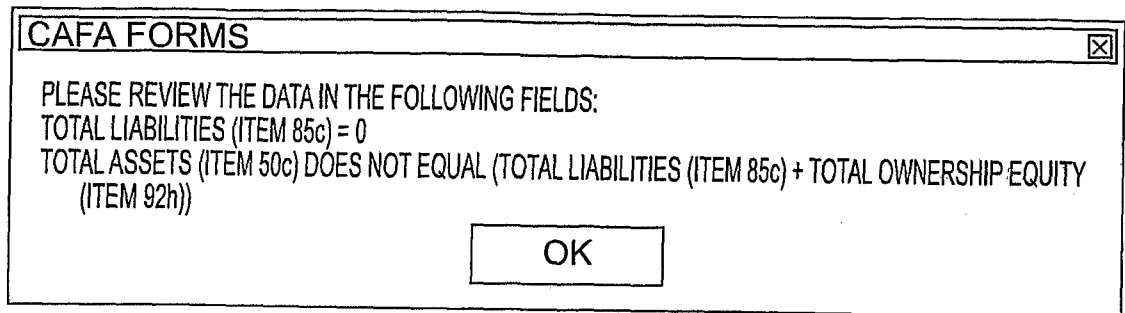


FIG. 11

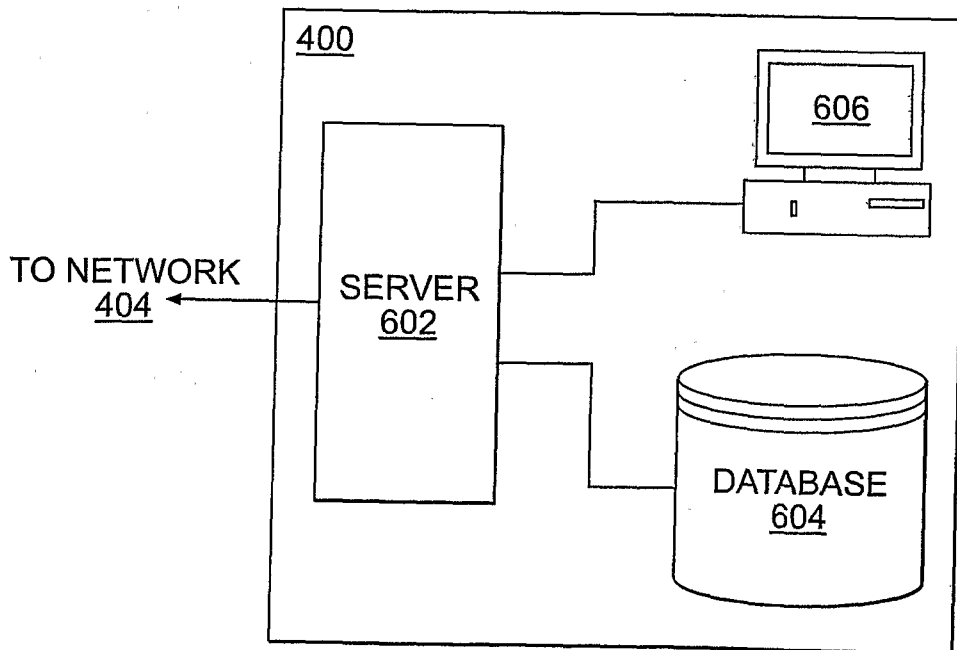


FIG. 12

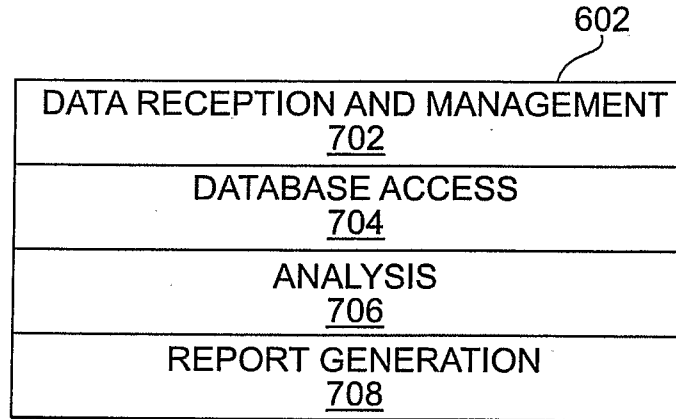


FIG. 13

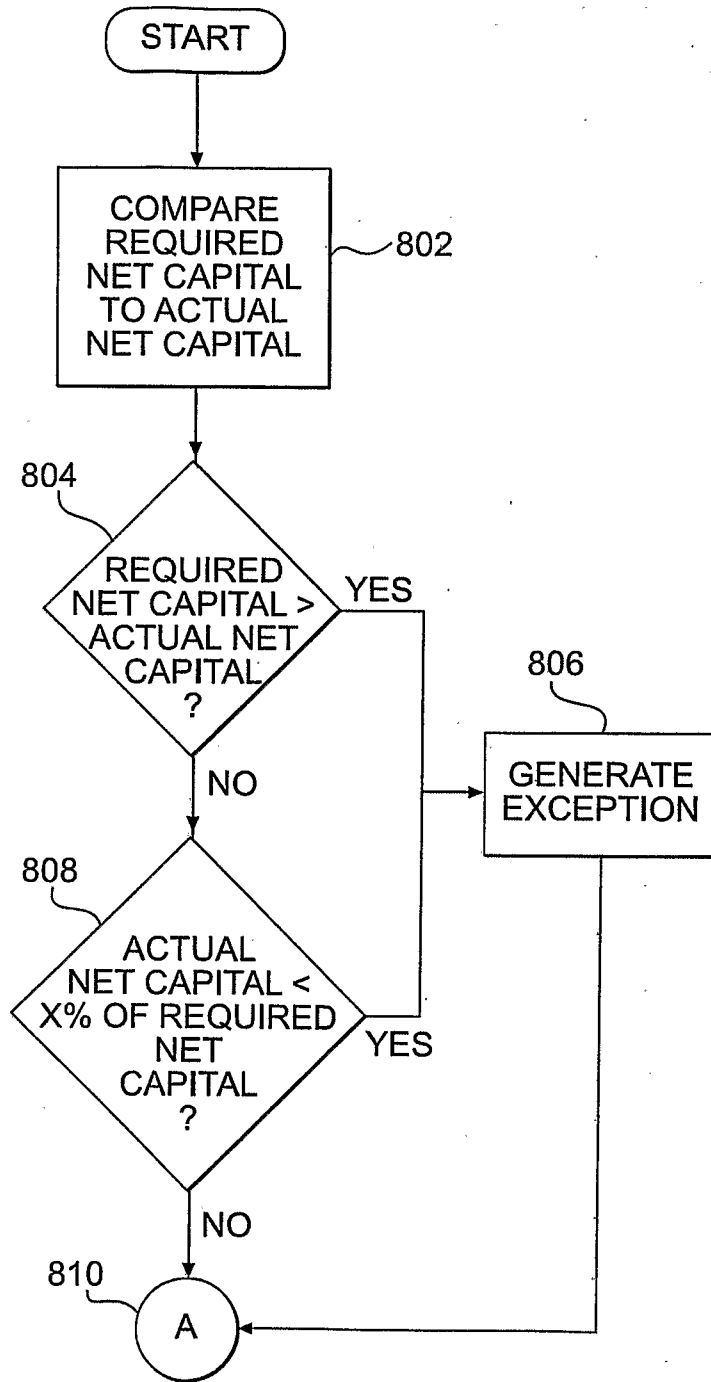
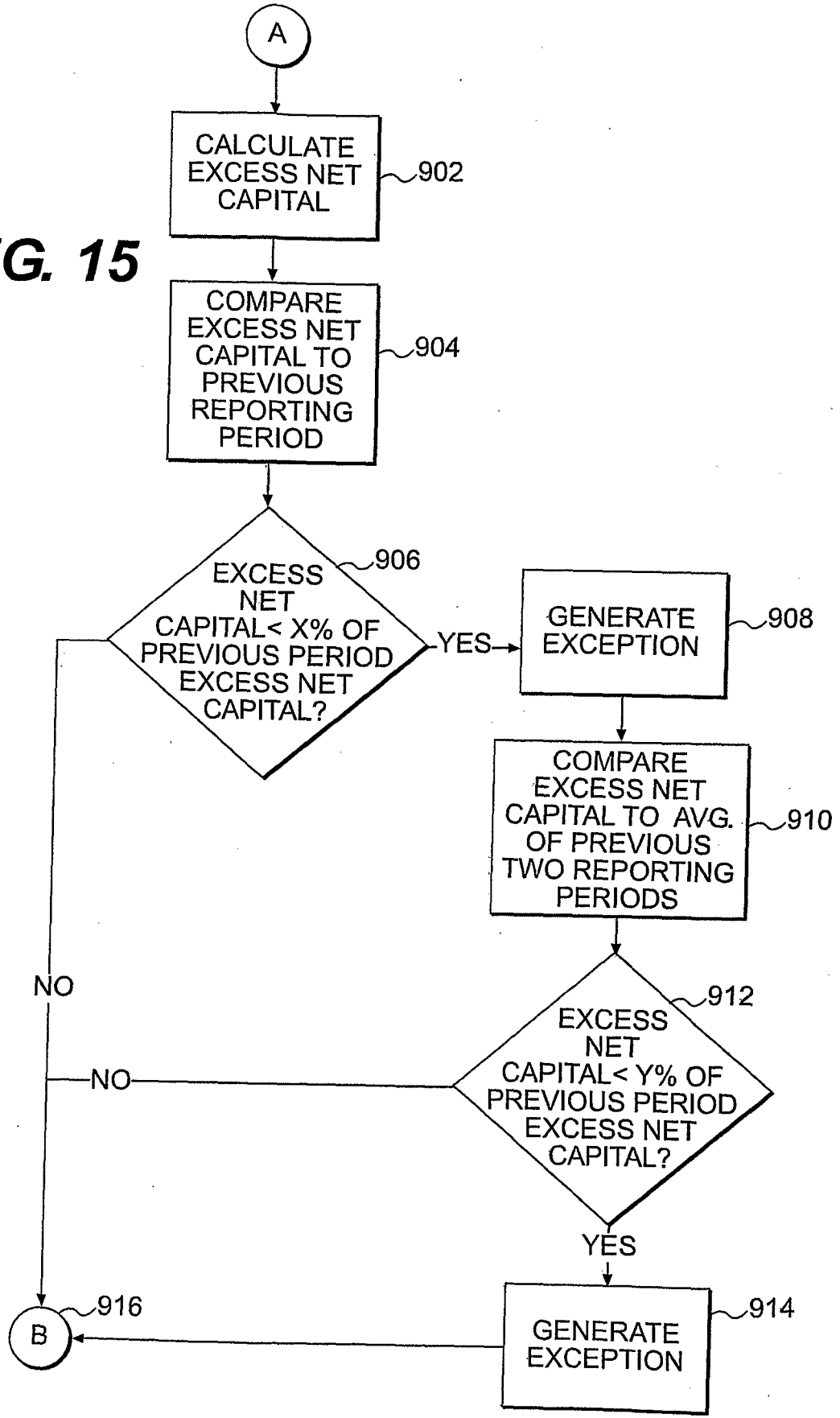


FIG. 14

FIG. 15



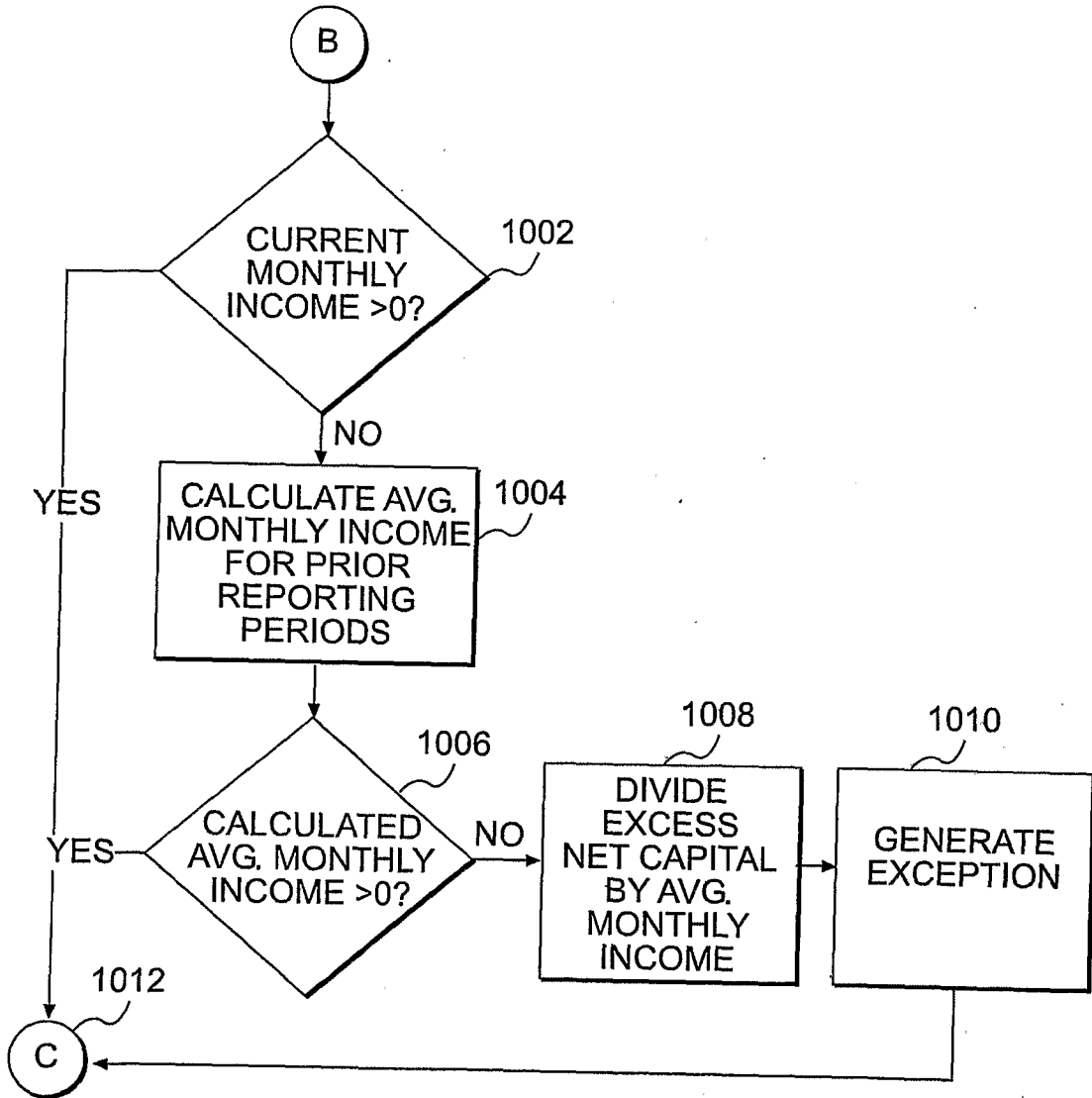


FIG. 16

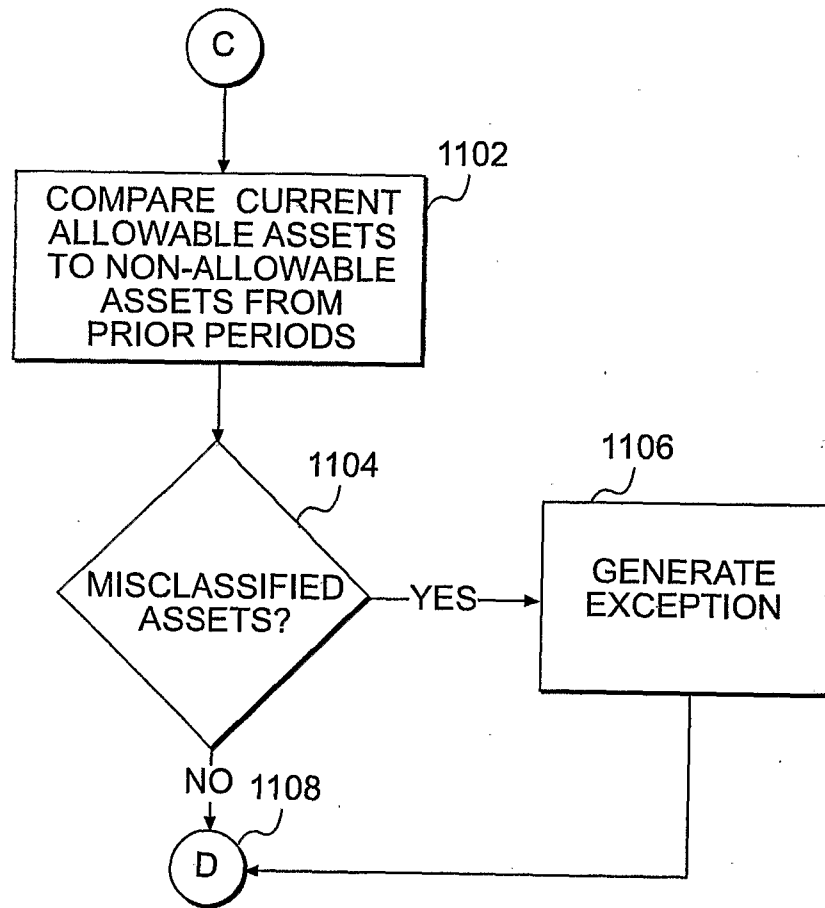


FIG. 17

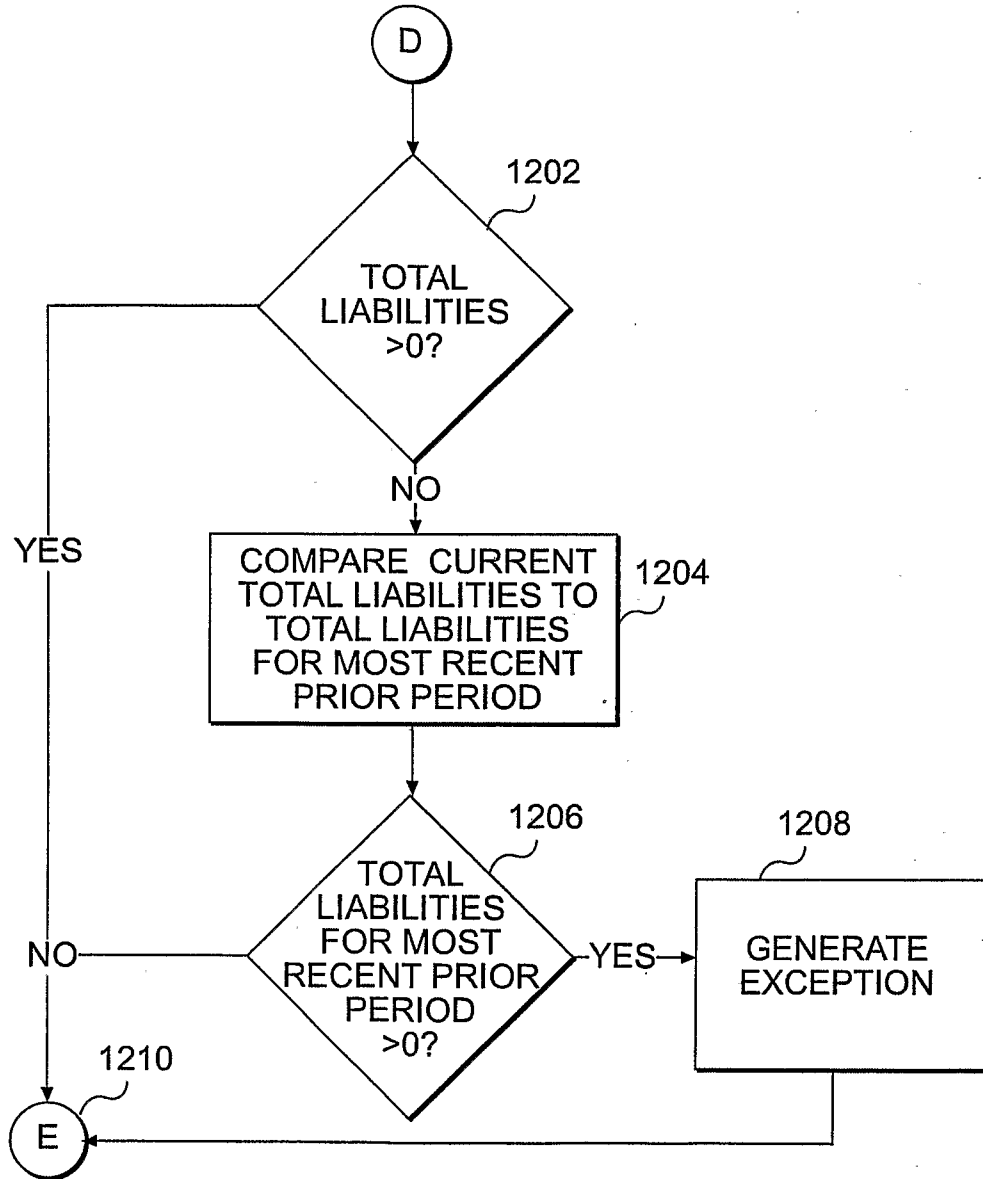


FIG. 18

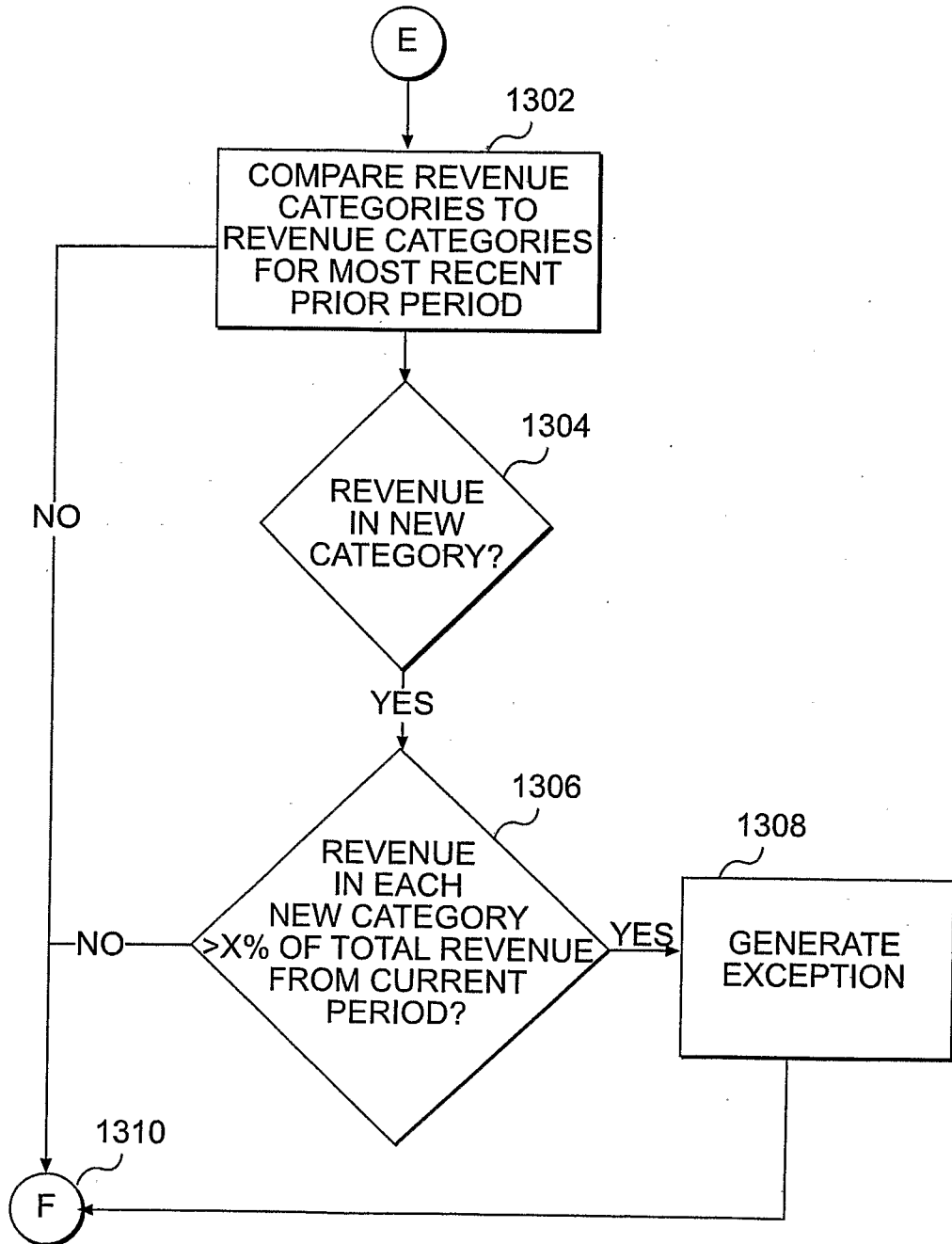


FIG. 19

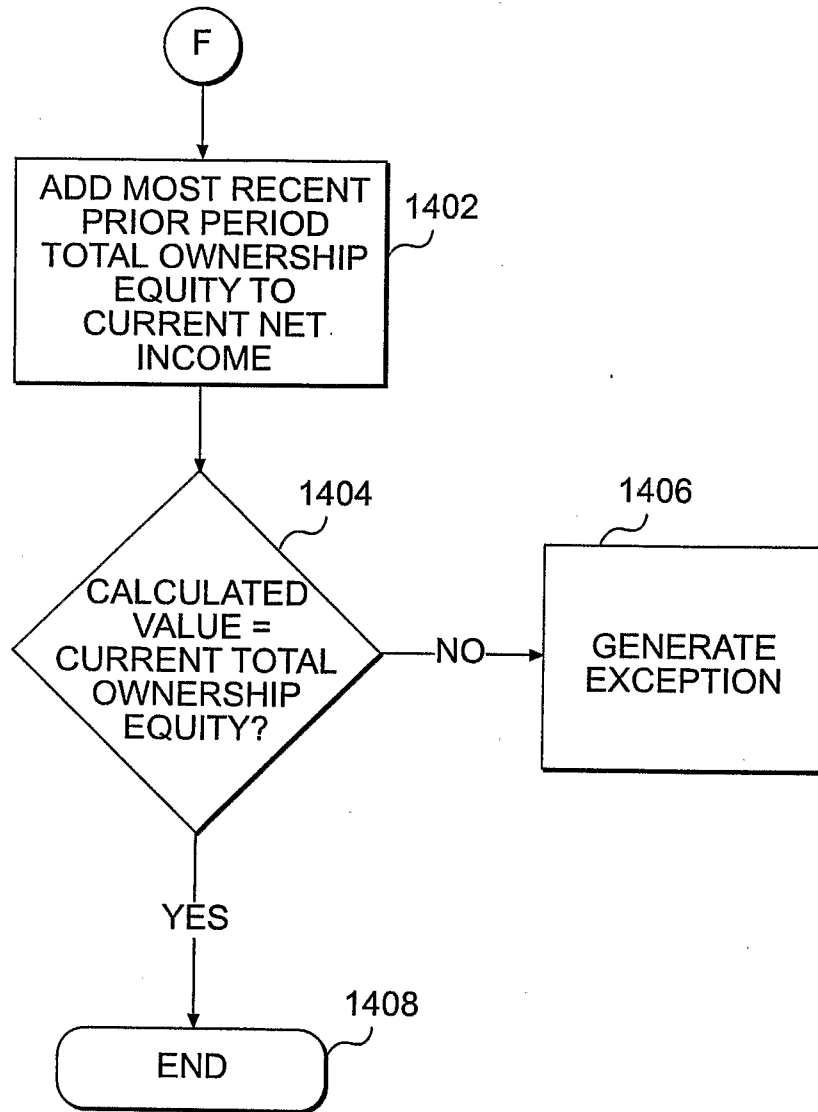


FIG. 20

CAFA Analysis

Criteria:

Exceptions

Load Filing(s)	Exception Type	Authorized Person(s)	Review Period	Description	Exception Date	Filing Data/Time	Status	Analyst	Comments
<input type="checkbox"/> >	<input type="checkbox"/> NCGC	Merry	JAN 2005	Net Capital Getting Close	7/27/2005 12:20:01 PM	7/27/2005 12:19:50 PM	Pending	SHER	SHER 7/27
<input type="checkbox"/> >	<input type="checkbox"/> INC	Merry	JAN 2005	Net Capital Exception	7/27/2005 12:20:01 PM	7/27/2005 12:19:50 PM	Under Review	SHER	7/27/2005 12:44pm S
<input type="checkbox"/> >	<input type="checkbox"/> SL	Merry	JAN 2005	Subordinated Loans	7/27/2005 12:20:01 PM	7/27/2005 12:19:50 PM	Pending	JUNG	

FIG. 21

Exception Reports

Report Help

Print...

1/2

Backward Forward

Additions/Deductions to Entity's Net Capital

Ending equity current period does not reconcile, check for additions/deductions to capital.

Authorized Person	A.G. Edwards	Preparer's Name	Belcher, Sheri
Review Period	SEP 2005	Preparer's Phone No.	240-366-6044
Filing Date-Time	6/1/2005 3:11:33 PM	Preparer's Email	sbelcher@scwab.com

Total Ownership Equity (Previous Period)	+ Monthly Income (Current Period)	DOES NOT EQUAL Total Ownership Equity (Current Period)
1,459,894,614	20,093,735	1,486,361,746

Total Ownership Equity (Current Period)	Total Ownership Equity (Previous Period)	
1,486,361,746	1,459,894,614	

Monthly Income (Current Period)	Monthly Income (Previous Period)	
20,093,735	20,821,588	

Analyst Comments

FIG. 22

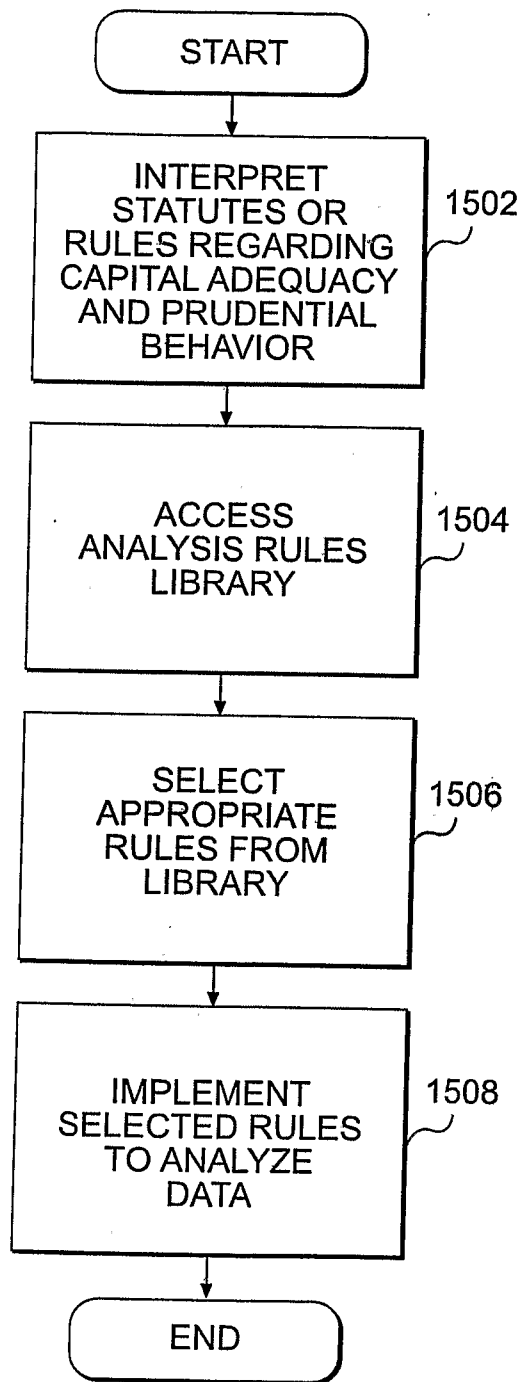


FIG. 23

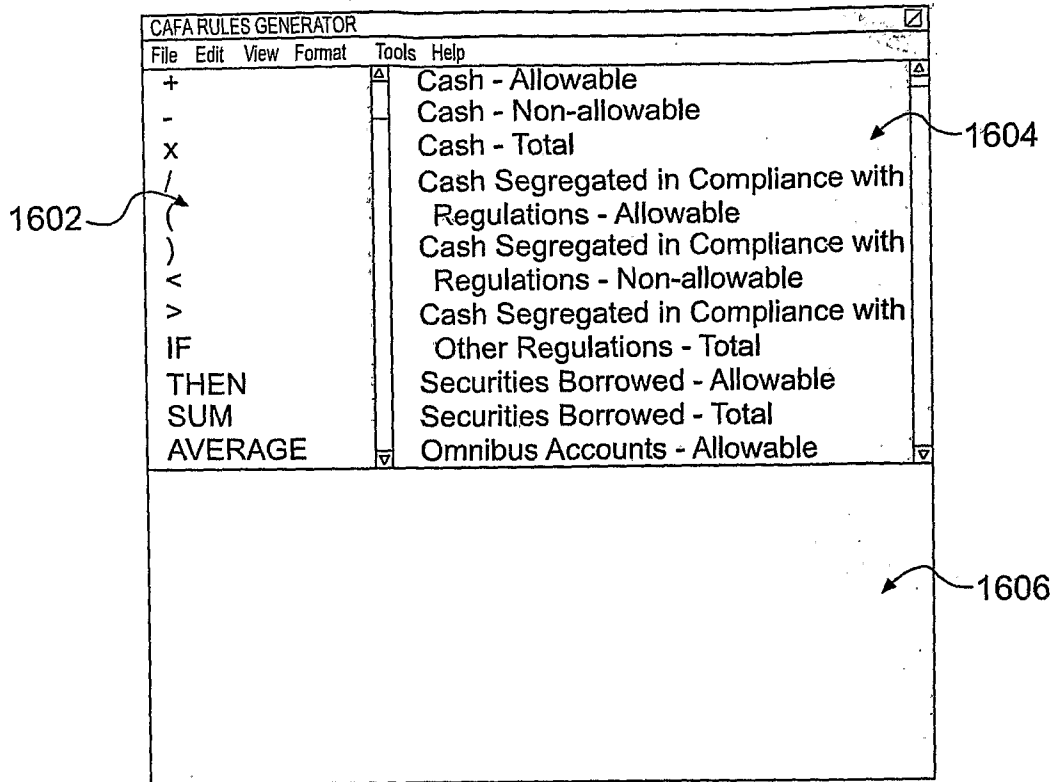


FIG. 24

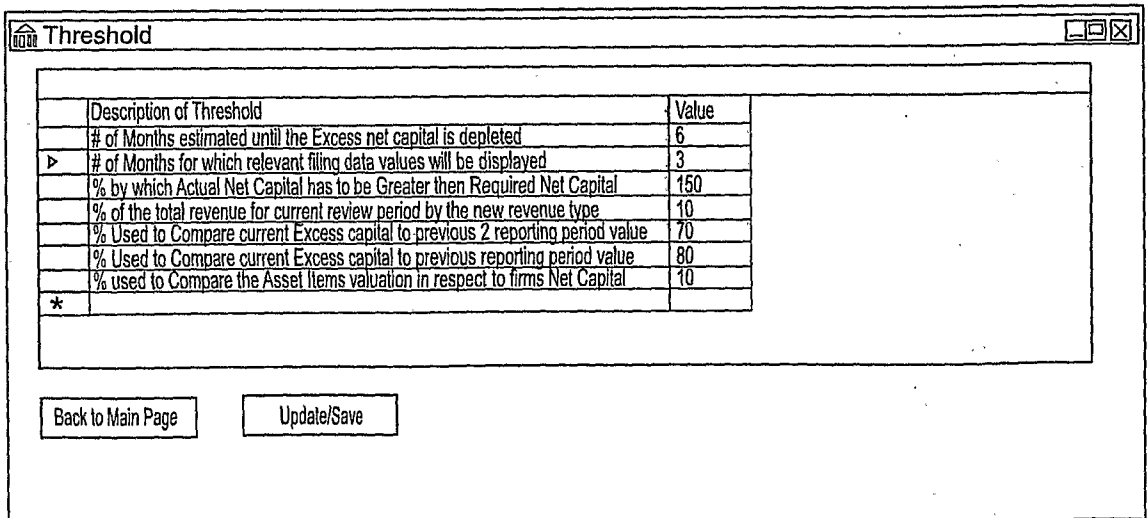


FIG. 25

INTERNATIONAL SEARCH REPORT

International application No.

PCT/US 06/34981

A. CLASSIFICATION OF SUBJECT MATTER IPC(8): G07B 17/00 (2007.01) USPC: 705/30 According to International Patent Classification (IPC) or to both national classification and IPC		
B. FIELDS SEARCHED		
Minimum documentation searched (classification system followed by classification symbols) IPC(8): G07B 17/00 (2007.01) USPC: 705/30		
Documentation searched other than minimum documentation to the extent that such documents are included in the fields searched USPC: 705/1, 30, 35 (search terms below)		
Electronic data base consulted during the international search (name of data base and, where practicable, search terms used) WEST (USPT,USOC,EPAB,JPAB; PLUR) and Google Patents (http://www.google.com/patents). A search performed on Google Patents, e.g., would have included the search terms "capital adequacy net adjust securities."		
C. DOCUMENTS CONSIDERED TO BE RELEVANT		
Category*	Citation of document, with indication, where appropriate, of the relevant passages	Relevant to claim No.
X -- Y	US 6,144,947 A (SCHWARTZ) 7 November 2000 (07.11.2000): col 3, ln 5; col 3, ln 6-11; col 3, ln 27-28; col 3, ln 19-22; col 8, ln 8; col 2, ln 52-54; col 10, ln 5; col 9, ln 12-14; col 9, ln 10-11; fig. 1	1-2, 4-6, 8, 11-12, 14-25, 27-40, and 45-46 ----- 3, 7, 9-10, 13, 26, 41-44, and 47
Y	US 5,297,032 A (BLACK et al.) 4 January 2000 (04.01.2000): col 3, ln 63-66; fig. 1, element 12	7, 9-10, 11, 13, 41-44, and 47
Y	US 2002/0128874 A1 (MCINTOSH et al.) 12 September 2002 (12.09.2002): para. 0022; para. 0023	3 and 26
<input type="checkbox"/> Further documents are listed in the continuation of Box C. <input type="checkbox"/>		
* Special categories of cited documents:		
"A"	document defining the general state of the art which is not considered to be of particular relevance	"T" later document published after the international filing date or priority date and not in conflict with the application but cited to understand the principle or theory underlying the invention
"E"	earlier application or patent but published on or after the international filing date	"X" document of particular relevance; the claimed invention cannot be considered novel or cannot be considered to involve an inventive step when the document is taken alone
"L"	document which may throw doubts on priority claim(s) or which is cited to establish the publication date of another citation or other special reason (as specified)	"Y" document of particular relevance; the claimed invention cannot be considered to involve an inventive step when the document is combined with one or more other such documents, such combination being obvious to a person skilled in the art
"O"	document referring to an oral disclosure, use, exhibition or other means	"&" document member of the same patent family
"P"	document published prior to the international filing date but later than the priority date claimed	
Date of the actual completion of the international search 28 June 2007 (28.06.2007)		Date of mailing of the international search report 13 SEP 2007
Name and mailing address of the ISA/US Mail Stop PCT, Attn: ISA/US, Commissioner for Patents P.O. Box 1450, Alexandria, Virginia 22313-1450 Facsimile No. 571-273-3201		Authorized officer: Lee W. Young PCT Helpdesk: 571-272-4300 PCT OSP: 571-272-7774