

OMNI TRADE 22c-2

Omni Trade 22c-2 supports the import of ad-hoc NSCC-formatted requests and reminder records, as well as export of NSCC-formatted acknowledgements, rejects, summary responses and detail responses. All ad-hoc processing complies with NSCC specifications, using the layouts published in its Standard Data Reporting (SDR) User Guide and Best Practices document. In addition to ad-hoc processing, Omni supports the SunGard Global Network (SGN) daily repository model, which provides the information necessary to comply with SEC Rule 22c-2.

REPORTING

Omni Trading 22c-2's reporting feature gives Omni Defined Contribution customers an automated method for satisfying fund company SEC Rule 22c-2 reporting requirements. For current Omni Trade customers, Trade 22c-2 reporting is integrated as an extension of Omni Trade. For customers that do not use Omni Trade, another version of the Omni Trade 22c-2 reporting feature is available that is designed specifically for SEC Rule 22c-2 processing.

The Omni Defined Contribution sequential history file contains detailed participant activity and acts as the primary source of information for Omni 22c-2 reporting. The history file contains options and controls for selecting recordkeeping activity applicable to 22c-2 reporting. It allows you to categorize activity according to fund company standard requirements and provide account setup information.

ABOUT SEC RULE 22c-2

SEC Rule 22c-2 requires plan intermediaries to provide reports of summary and participant-level trade activity within mutual fund accounts upon request. SEC Rule 22c-2 provides fund companies with the power to enforce compliance of their redemption fee and market timing restrictions. It is expected that funds with strict redemption fee and / or market timing rules will rely heavily upon these reports to monitor activity within plans to identify abusive trading practices. To demonstrate compliance with SEC Rule 22c-2, funds must periodically collect information on transactions within qualified retirement plans to determine whether any violations have occurred.

DAILY REPOSITORY AND AD-HOC MODELS

Within the solution, daily repository and ad-hoc processing models are available. The daily repository model is available for customers using SGN for their 22c-2 compliance efforts. The daily repository model captures participant activity each day from the Omni Defined Contribution solution and creates an interface file containing all 22c-2 detail and summary trade activity in SGN format. That newly formatted file is then transmitted to SGN. SGN stores the activity for the trading intermediary or SGN to use in responding to requests received from a fund company.

The Omni Trade 22c-2 ad-hoc model allows you to store participant-level activity detail received from the Omni Defined Contribution system in the Omni Trade 22c-2 reporting's master files. Requests can be received through the SGN interface from either your trading intermediary or manually, and the ad-hoc model generates and transmits automatic responses back to either SGN or your trading intermediary.

For more information on SunGard's Omni Trade 22c-2 and what it can do for your organization, please contact your account manager.

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