

NATIONAL FUTURES ASSOCIATION

# NFA Webinar: NFA's New Expanded Filing Requirements for Commodity Pool Operators

Today's Presenters:

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#### NFA Rule 2-46

**CPO Quarterly Reporting Requirements** 

Goal: Obtain key pool information to meet NFA's regulatory risk management objectives while maintaining as little data entry burden on the CPO as possible.



#### Who Must File?

- The CPO must report for each pool that has a reporting requirement under CFTC Regulation 4.22.
- Essentially, the following would not have to report:
  - Pools with exemptions pursuant to CFTC Regulation 4.13 or 18-96(a)
  - Pools that are organized as Master Funds



### When Must Report be Filed?

- Each Quarterly Report must be filed within 45 days of the end of each quarterly reporting period.
- E-mail notifications will be automatically sent both before and after (if applicable) the due date to remind the CPO of the requirement.



### How Will Report be Filed?

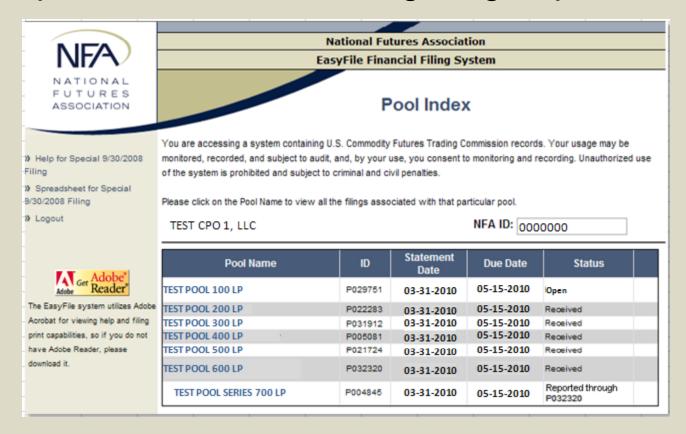
 All filings, whether the annual pool financial statement (PFS) or the quarterly report (PQR) will be managed through NFA's Web-based EasyFile System.

- One location for all filings
- Same sign-ons and passwords



#### Pool Index

Lists pools and all outstanding filing requirements:



 Click on Pool Name to view outstanding requirements for that pool through its Filing Index



### Filing Index

Lists prior filings as well as open requests for specific pool.



Click on "End Date" to initiate filing.

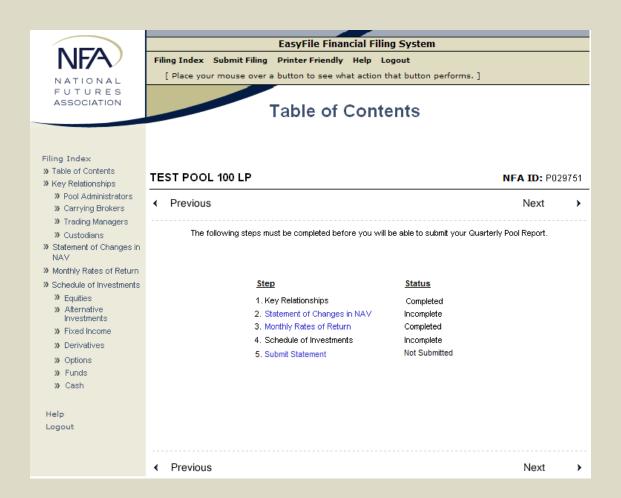


#### What must be Filed?

- Four Sections:
  - 1. Key Relationships
  - 2. Statement of Changes in Net Asset Value
  - 3. Monthly Rates of Return for Quarter
  - 4. Schedule of Investments



#### **Table of Contents**



The Table of Contents screen will list out all the required sections of the filing along with their current status. The list items are clickable to provide easy access to any section.



#### 1. Key Relationships

The Pool Quarterly Report (PQR) filing will begin with the collection of four key relationships for the pool:

- 1. Pool Administrators
- 2. Carrying Brokers
- 3. Trading Managers
- 4. Custodians



#### **Features**

- Relationship data will persist from filing to filing so it doesn't have to be re-entered.
- User starts by typing name of firm and system will prompt with existing entries.
  - > This is intended to prevent duplicate entries.



### Relationship Screen



Initially, if the pool doesn't have any relationships, a No relationships reported message will be displayed in place of the relationships grid.

To add a relationship, click on the link entitled "Click here to add a relationship".

If no relationships exist in this category, then click on the link entitled "Click here if the above relationship information is complete".



### Adding a Relationship



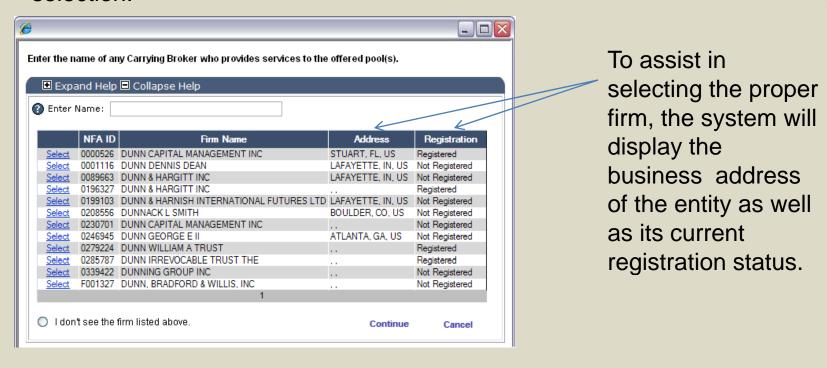
Clicking the link entitled "Click here to add a relationship" will launch this pop up window. On this pop up screen, the user will enter the name of the firm and the system will perform a search of the NFA database for matches to existing firms.

This search will cover both registered firms and unregistered firms that were previously entered through other relationships.



### Adding a Relationship

If any matches are found, they will be displayed in a grid list for selection.



The user here can either select an existing firm or check "*I don't see* the firm listed above". Clicking on the Continue button will forward the user to the next screen to finalize the relationship.



### Adding a Relationship



If the user selected an existing firm from the list, then this screen will pop-up. Since the user selected an existing firm from the list, this screen will be pre-filled with all contact and address information. The *Start Date* field will be the only field that can be edited. The *Start Date* is a required field to add any relationship. Help text will be provided for this field in case the filer does not know or remember the start date.

If the user didn't select an existing firm or no firms were found during the initial search process, this screen will be blank with the exception of the *Firm Name* that was entered. All the fields designated by an asterisk must be completed before the relationship can be added.



#### Relationship Screen





#### **Carrying Broker Relationships**

Filing Index

- » Key Relationships
  - » Pool Administrators
  - Carrying Brokers
  - >> Trading Managers
  - > Custodians
- Statement of Changes in NAV
- » Monthly Rates of Return
- Schedule of Investments
  - > Equities
  - » Alternative Investments
  - Fixed income
  - » Derivatives
  - » Options
  - » Funds» Cash
- Help Logout

**TEST POOL 100 LP** 

NFA ID: P029751

Next

Please disclose any Carrying Broker relationships associated with the offered pool(s).

Existing Carrying Broker relationships (Please delete if no longer active):

Name	ID	StartedOn		
UBS SECURITIES LLC	0223988	1/1/2001	Delete	Edit
RAND FINANCIAL SERVICES INC	0244931	1/2/2003	Delete	Edit
MF GLOBAL INC	0326888	6/1/2007	Delete	Edit

Click here to add a relationship.

Click here if the above relationships information is complete.

Previous

Once relationships are added, they will appear in a grid format.

Clicking on the "Delete" link will remove an existing relationship from this screen.

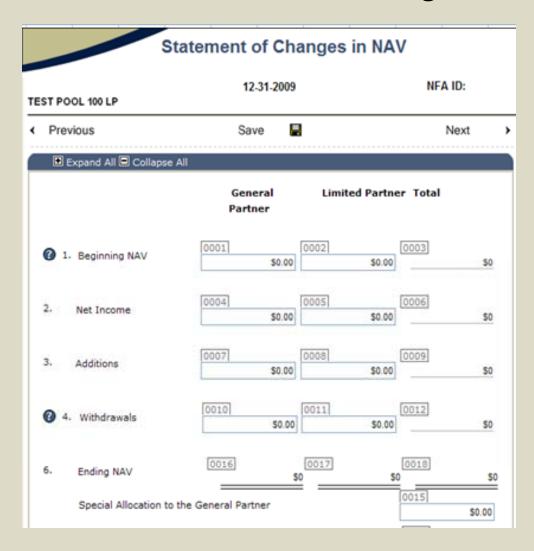
Clicking the "Edit" link will launch the relationship detail screen (description will follow) on which only the Start Date of the relationship can be modified.

Clicking the "Next" button will leave the status of this relationship category unchanged (open).

Clicking the link entitled "Click here if the above relationships information is complete" will mark the status of this relationship category complete.



#### 2. Statement of Changes in NAV



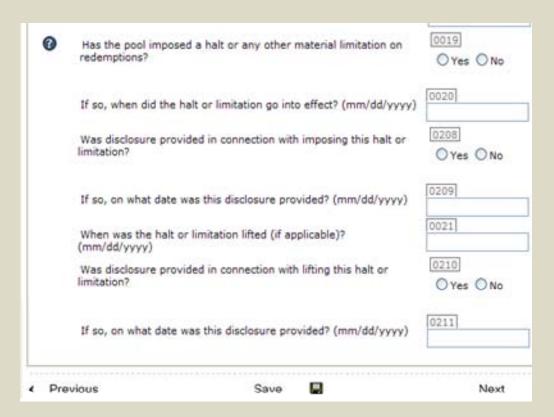
Beginning NAV will carryover from the previous period's Ending balance (but it can also be edited).

The total fields will be calculated automatically as the user enters balances.



#### 2. Statement of Changes in NAV





Note the new section on halted redemptions

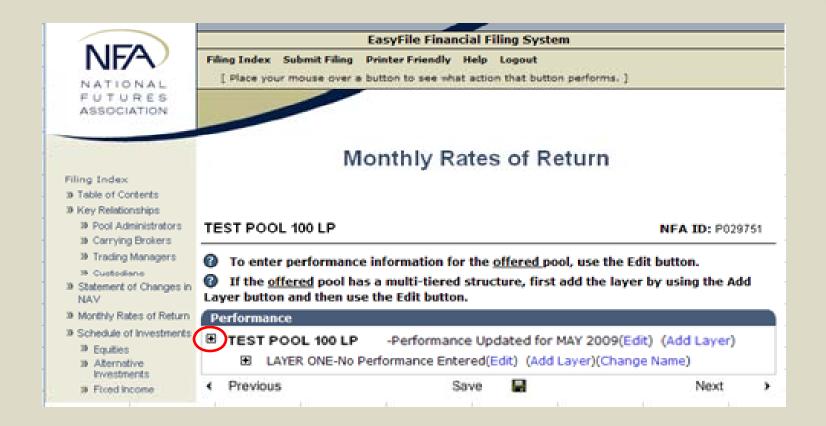


### 3. Monthly Rates of Return

- Enter only the three months from the current quarter
- Previously entered returns will persist from filing to filing and can be edited if necessary
- Performance reported through Disclosure Document submissions will be carried-over (and vice versa)
- Supports multi-class entry



#### Monthly Rates of Return Entry



Clicking the +/- sign will expand the rates of return table for the pool/layer



#### Monthly Rates of Return Entry



Filing Index Submit Filing Printer Friendly Help Logout

[ Place your mouse over a button to see what action that button performs. ]

#### Monthly Rates of Return

#### Filing Index

- 3) Table of Contents
- 39 Key Relationships
- 3 Pool Administrators
- 3 Carrying Brokers
- 39 Trading Managers
- 3) Custodians
- Statement of Changes in NAV
- 3) Monthly Rates of Return | Performance
- Schedule of Investments
- 3) Equities
- 3) Alternative Investments
- 3) Fixed Income
- 39 Derivatives
- 3 Options
- 30 Funds
- 3) Cash

Help Logout **TEST POOL 100 LP** 

NFA ID: P029751

- To enter performance information for the offered pool, use the Edit button.
- If the offered pool has a multi-tiered structure, first add the layer by using the Add Layer button and then use the Edit button.

Month	2010	2009	2008	2007	2006	2005	2004
Jan		-6.27%	16.15%	5.87%	-3.78%	-5.49%	.50%
Feb		1.65%	24.52%	-10.92%	-2.86%	-5.27%	17,11%
March		-8.37%	-3.06%	-6.40%	9.49%	.03%	3.13%
April		.94%	-5.73%	5.59%	15.20%	-10.59%	-16.91%
May		10.34%	7.36%	11.28%	-4.86%	12.26%	-3.51%
June			3.81%	7.36%	-5.21%	6.13%	-5.88%
July			-9.52%	-16.50%	-8.73%	-3.26%	-4.93%
August			4.78%	-15.78%	-2.79%	-1.59%	3.85%
Sept			4.85%	15.11%	90%	-4.52%	-2.01%
Oct			26.55%	1.88%	-1.11%	3.10%	10.75%
November			14.06%	2.50%	7.28%	7.22%	9.13%
Dec			7.28%	1.85%	03%	-6.33%	-3.08%
Year		-2.77%	126.76%	-4.13%	86%	-10.20%	3.81%

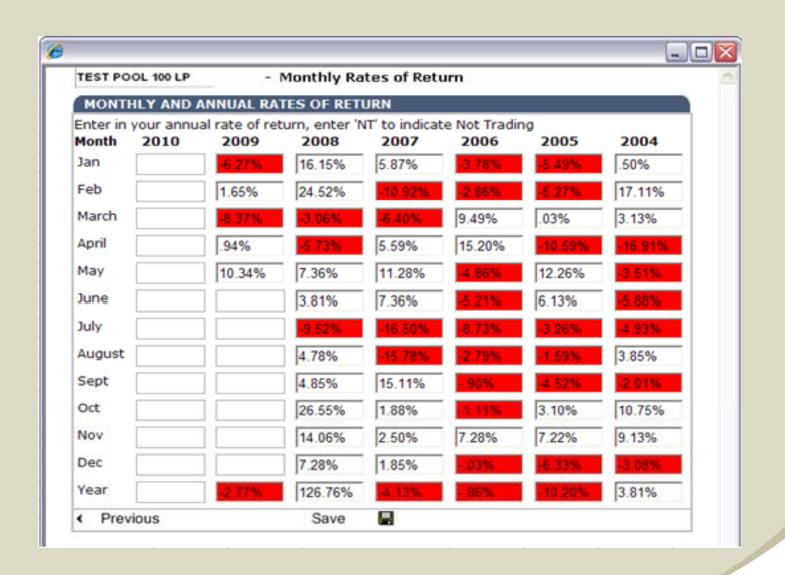
Close Performance

- LAYER ONE-No Performance Entered(Edit) (Add Layer)(Change Name)
- ✓ Previous Save 
   Next >

Clicking on the *Edit* button will launch the rates of return detail screen where values can be entered or edited



#### Monthly Rates of Return Detail Entry





#### Monthly Rates of Return – Class Entry



EasyFile Financial Filing System

Filing Index Submit Filing Printer Friendly Help Logout

[ Place your mouse over a button to see what action that button performs. ]

#### Monthly Rates of Return

#### Filing Index

- 3) Table of Contents
- 39 Key Relationships
- 39 Pool Administrators
- 39 Carrying Brokers
- 3) Trading Managers
- 3) Custodians
- Statement of Changes in NAV
- 39 Monthly Rates of Return
- 39 Schedule of Investments
- 39 Equities
- Alternative Investments
- 3) Fixed Income
- 3 Derivatives
- 3 Options
- 39 Funds 39 Cash
- Help Logout

**TEST POOL 100 LP** 

NFA ID: P029751

Close Performance

- To enter performance information for the <u>offered</u> pool, use the Edit button.
- If the offered pool has a multi-tiered structure, first add the layer by using the Add Layer button and then use the Edit button.

#### Performance

Month	2010	2009	2008	2007	2006	2005	2004
Jan		-6.27%	16.15%	5.87%	-3.78%	-5.49%	.50%
Feb		1.65%	24.52%	-10.92%	-2.86%	-5.27%	17,11%
March		-8.37%	-3.06%	-6.40%	9.49%	.03%	3.13%
April		.94%	-5.73%	5.59%	15.20%	-10.59%	-16.91%
May		10.34%	7.36%	11.28%	-4.86%	12.26%	-3.51%
June			3.81%	7.36%	-5.21%	6.13%	-5.88%
July			-9.52%	-16.50%	-8.73%	-3.26%	-4.93%
August			4.78%	-15.78%	-2.79%	-1.59%	3.85%
Sept			4.85%	15.11%	90%	-4.52%	-2.01%
Oct			26.55%	1.88%	-1.11%	3.10%	10.75%
November			14.06%	2.50%	7.28%	7.22%	9.13%
Dec			7.28%	1.85%	03%	-6.33%	-3.08%
Year		-2.77%	126.76%	-4.13%	86%	-10.20%	3.81%

To add performance for a class, click "Add Layer".



#### Monthly Rates of Return – Class Entry



7.28%

■ LAYER ONE-No Performance Entered(Edit) (Add Layer)(Change Name)

Save

126.76%

Please enter the name for this layer: TEST LAYER ONE

Dec

Year

← Previous

Enter name of class.

Any number of classes can be added as layers.

Names can be subsequently edited by clicking "Change Name"

Click "Save Layer" to

commit.

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1.85%

-4.13%

-.03%

-6.33%

-10.20%

Save Layer

-3.08%

3.81% Close Performance

Cancel

Next

Monthly Rates of Return - Class Entry



Click "+/-" next to each layer to expand/contract performance info.

To enter rates of return, click the "Edit" link.



#### 4. Schedule of Investments

 The focus of the system is to capture all individual pool investments greater than 10% of the Pool's NAV.

 Also get dollar value breakdown of all investments in 7 major categories.

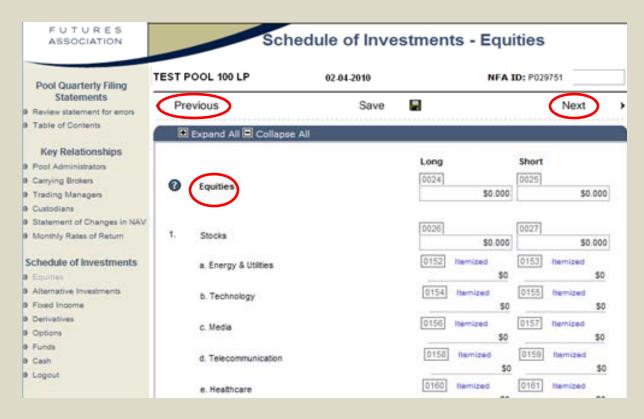


#### Schedule of Investments

- The 7 major categories:
  - Equities
  - Fixed Income
  - Alternative Investments
  - Derivatives
  - Options
  - Funds
  - Cash



#### Schedule of Investments-Equities

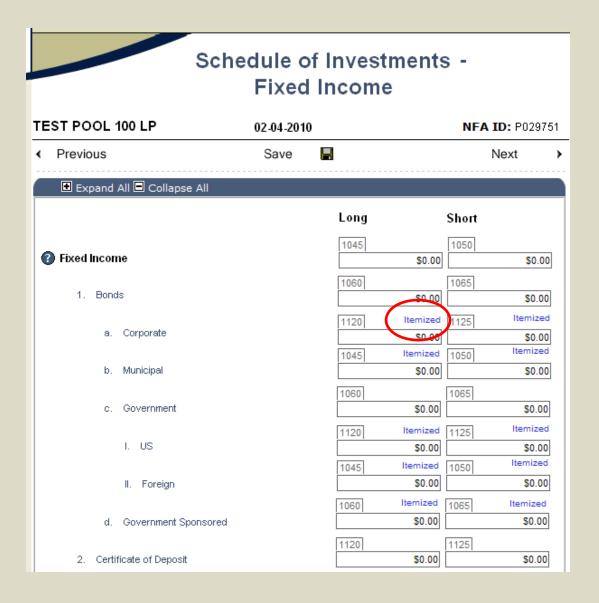


Each Investment
Category will have
its own entry
screen.

Click "Next" or "Previous" to navigate or use the menu on the left.



#### Schedule of Investments - Fixed Income



Listing will expand or contract around various investment types to reduce clutter when necessary.

Both long and short values can be entered.



#### Schedule of Investments - Alternative Investments



Enter dollar values in respective fields.

Click "Itemized" if investment is >= 10% of NAV.



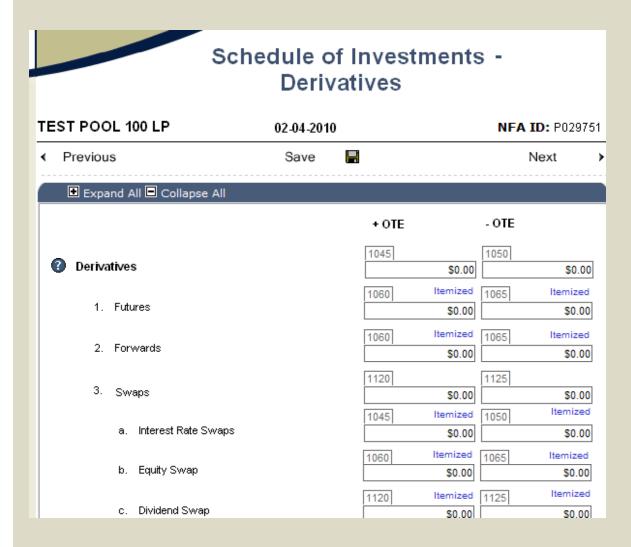
## Schedule of Investments – Detail Entry for Equities

							8
Add Equity Investment							1
Description of Investment:	YTD G/L	L	.ong/Short:	<b>✓</b> Co	st:	Add Investment	
Existing Investments  Description of Investment	Long/Short	Cost	Fair Value	YTD G/L		<u> </u>	
Existing Investments	_	Cost \$123.00	Fair Value \$129.00	YTD G/L \$123.00	Delete		
Existing Investments  Description of Investment	Long/Short Long Short				Delete Delete		
Existing Investments  Description of Investment Test description 1	Long	\$123.00	\$129.00	\$123.00			
Existing Investments  Description of Investment Test description 1 Test description 2	Long Short	\$123.00 \$456.00	\$129.00 \$467.00	\$123.00 \$456.00	<u>Delete</u>		
Existing Investments  Description of Investment Test description 1 Test description 2 Test description 3	Long Short Long	\$123.00 \$456.00 \$789.00	\$129.00 \$467.00 \$1,023.00	\$123.00 \$456.00 \$789.00	Delete Delete		

As each itemization is entered, it will be added to the grid. Use the "Delete" link to remove unnecessary entries.



#### Schedule of Investments - Derivatives



Because Derivatives can have a negative value, breakdown is according to positive or negative OTE for the investment.

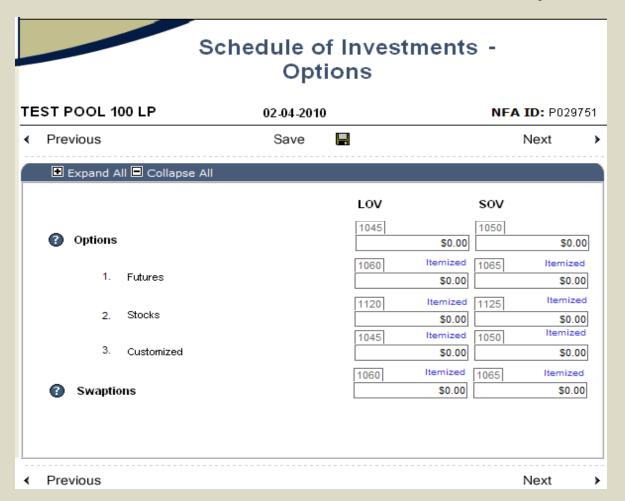


# Schedule of Investments – Detail Entry for Derivatives

Add Derivatives Investment						
Add Derivatives investment						
Description of Investment:			Long/Short:	<b>v</b> 0	TE	
	L VTD G/L					<ul> <li>Add Investment</li> </ul>
Counterparty	YTD G/L					
Counterparty	110 0/2					
Counterparty  Existing Investments						
		ОТЕ	Counterparty	YTD G/L		<u> </u>
Existing Investments				YTD G/L \$123.00	<u>Delete</u>	
Existing Investments  Description of Investment	Long/Short	ОТЕ	text		Delete Delete	
Existing Investments  Description of Investment Test description 1	Long/Short Long	OTE \$123.00	text text	\$123.00	<u>Delete</u>	



#### Schedule of Investments - Options



For Options and Swaptions, breakdown is by Long Option Value and Short Option Value.

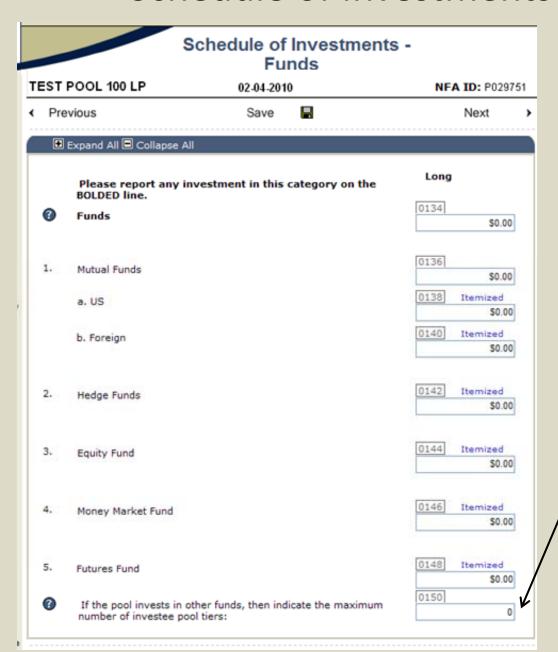


#### Schedule of Investments – Detail Entry for Options

Add Options Invest	ment							
Description of Invest	ment:		Long/9	Short:	~			
Premium Paid (Colle	ected)		Ontion	Value				
				_				
Counterparty		YTD G/L				Add	Investment	
Existing Investment  Description of Investment	Long/Short	(Collected)	Option Value	Counterparty	YTD G/L			
Test description 1	Long	\$123.00	\$3,211.00		\$123.00	<u>Delete</u>		
Test description 2	Short	\$456.00	\$1,231.00		\$456.00	<u>Delete</u>		
Test description 3	Long	\$789.00	\$4,321.00		\$789.00	<u>Delete</u>		
•	Class	\$12.00	\$963.00	text	\$12.00	<u>Delete</u>		
Test description 4	Short	<b>*</b> · · · · · ·						



#### Schedule of Investments - Funds



For all fund investments, the CPO must indicate the number of tiers that the investee pool maintains.



## Schedule of Investments – Detail Entry for non-Futures Funds

Add Funds Investm	ont									1
Fund Name:	ent	Type of	Fund:			<b>v</b>	ost:			
Fair Value:			M <sub>0</sub> He	quity utual edge oney M	arket			Add Inve	stment	
Existing Investmen	ts									
Existing Investment										
Fund Name	Type of Fund	C	ost	Fair	r Value	Υī	TD G/L			
		C S	ost 123.00	Fair \$	r Value 135.00	YT \$	TD G/L 123.00	Delete		
Fund Name	Type of Fund							Delete Delete		
Fund Name ABC Fund	Type of Fund Equity	\$	123.00	\$	135.00	\$	123.00			

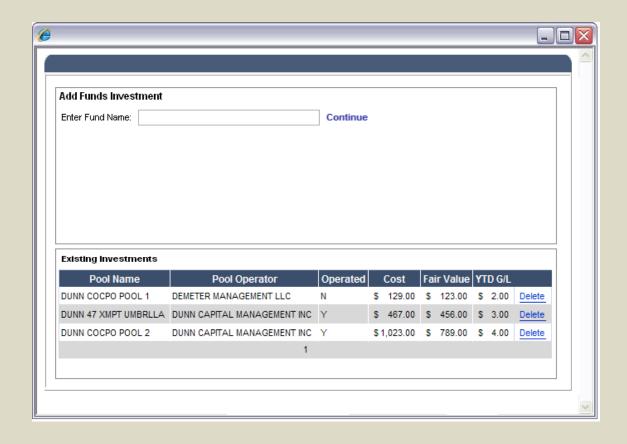


## Schedule of Investments – Detail Entry for Futures Funds

For Futures Funds, one additional objective is to ensure that if the pool invests in a master fund that is operated by the same CPO or an affiliate of the CPO, then NFA should receive a breakdown of the master fund's investments.



# Schedule of Investments – Detail Entry for Futures Funds

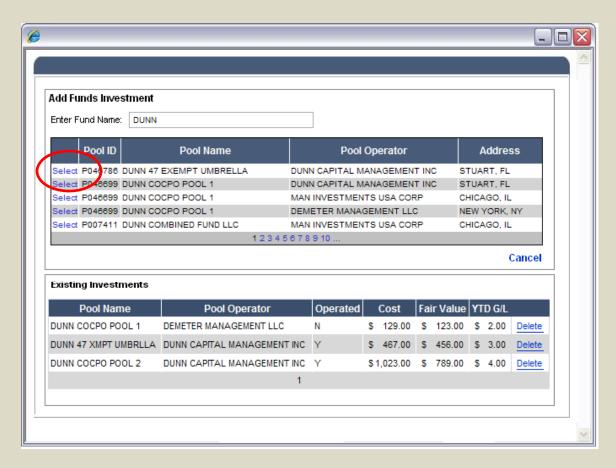


User must enter name of fund and click continue so the system can perform a search.

All futures funds should be in NFA's system— whether due to exemptions, disclosure document submissions or financial filings.



## Schedule of Investments – Detail Entry for Futures Funds



System will return funds with same or similar names.

Once fund is identified, user will click the "Select" button.



# Schedule of Investments – Detail Entry for Futures Funds



Once the proper fund is selected, the user will get this screen where he or she can enter the Fair Value and YTD Gain/Loss for the investment.

In the background, the system will determine if the CPO or an affiliate operates the investee pool.



## Schedule of Investments -Detail Entry for Futures Funds

If the investee pool is operated by the CPO or an affiliate, then the system will check to see if NFA has already asked for a quarterly filing.

If no quarterly filing has been requested, as in instances where the investee pool is a master, then the system will generate a separate filing request. (A "PQRS".)



This new filing request will only consist of a Schedule of Investments and Relationships for the master pool.

The CPO can continue with the current filing but it must eventually complete the extra report for the master pool in order to meet all of its filing obligations.

If the CPO has other pools that invest in this master, then it only has to enter the details once under the PQRS filing.



#### Schedule of Investments - Cash

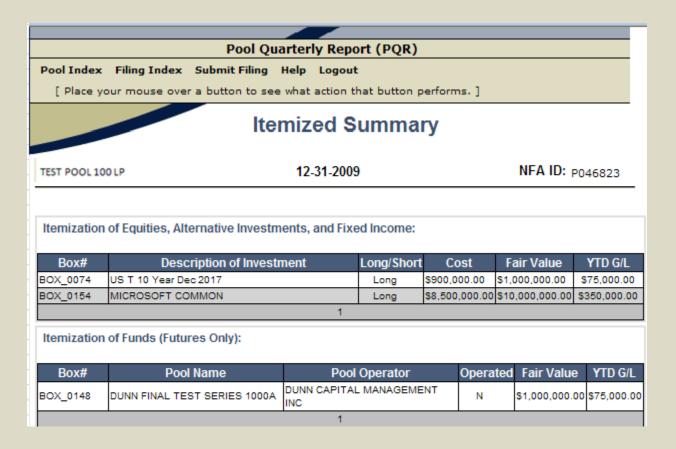
#### Final Investment Category Screen:





## **Detail Entry Review**

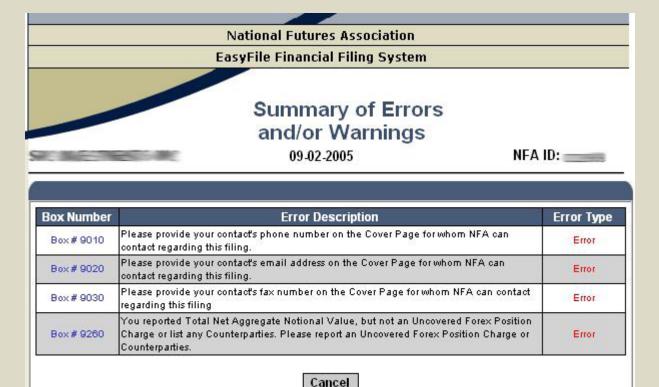
### System generates summary of detail entries





## Completing the Filing

 Errors will be generated if certain fields are not completed or if certain fields do not foot:

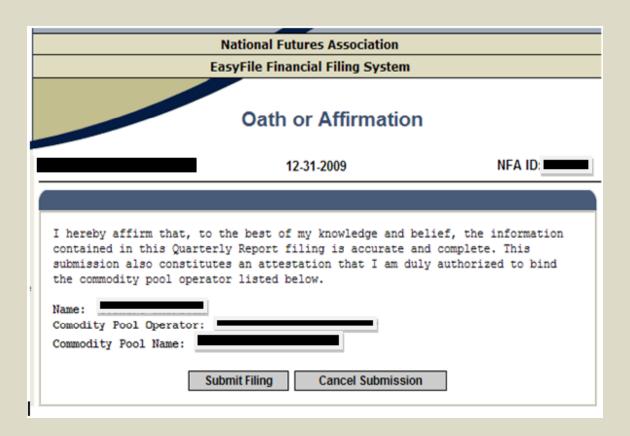


- Errors must be addressed before filing will be accepted.
- Warnings are simply notifications of potential problems or discrepancies They can either be addressed or passed upon.



## Completing the Filing

CPO must affirm accuracy and completeness.





#### Contact Us

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