

Jason S. Inman's response to GIPS Executive Committee's (EC) invitation to comment on proposed GIPS 2010 Exposure Draft:

As for the classification of a current verification, I believe that 18 months is sufficient time as this gives the firm six months to complete a verification of the prior year. Firms that cannot complete a verification within six months of year end appear to be suspect of what is going on there type questioning.

Fair value is definitely a good move.

On Page 5, the concept of valuing portfolios on the date of all external cash flows is a very costly proposal that adds little benefit to the accuracy of returns if any at all.

Yes all portfolios whether or not they pay fees should be in a composite.

Yes, firms should not be allowed to show composites to potential clients that do not have the minimum assets to invest in that composite strategy.

Yes, short positions should be included.

Key characteristics and risk should be addressed somehow in the composite presentation, while I am not sure if the composite description is the correct place, I do agree with the standard deviation disclosure.

Disclosure 5.A.5 regarding carve-outs should not be repealed as of 1/1/2011. Carve-Outs can still be used, cash just cannot be on an allocated basis. In other words, I can have a carve-out that maintains it's own cash balance.

Yes disclosing proprietary assets is important.

Yes firms should be allowed to provide "sponsor-specific composites" to the sponsor firm and mutual clients of the sponsor firm.

Yes specific verification procedures should be included in GIPS as minimum procedures.

I agree with the GIPS Valuation Principles and the definition of prospective client.

The views expressed above are of my own accord and may not necessarily be the views of McDonnell Investment Management, LLC.

Please let me know if you have questions and/or need further information.

Thank you,

Jason S. Inman, CPA, CIPM

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