

Teri Mahlmann's response to GIPS Executive Committee's (EC) invitation to comment on proposed GIPS 2010 Exposure Draft:

I would like to offer my comment on the following proposed standard change:

Input Data:

New Recommendations

Valuation Frequency

1.B.4 "Firms should value portfolios on the date of all external cash flows"

This proposed change would have the practical effect of causing my RIA firm to move to daily IRR calculation at both the portfolio and composite levels. The greatly expanded number of data points this change would produce would significantly complicate the returns calculation and proof process while adding minimal if any actual benefit to returns results. It is our firm's opinion that account revaluations for immaterial (<10%) external cash flows would often lead to period returns that reflect daily price fluctuations rather than true period TWRs.

Teri Mahlmann

C.P.A., Manager, Portfolio Administration

Gurtin Fixed Income Management, LLC

San Diego | Chicago

P: 312.588.7372

F: 858.436.2201

www.gurtin.com

1 East Wacker Drive, Suite 3100

Chicago, IL 60601