

I'm writing to say the proposed performance reporting requirements for wrap fee (managed) accounts, as outlined in the AIMR-PPS Guidance Statement, are not suitable for adoption. While I support AIMR's objective to ensure fair and accurate reporting of performance data for managed accounts, I suggest some amendments to the General Statement.

Record keeping and marketing practices of managed account programs are different from traditional institutional accounts. I believe managed account managers, including my firm, do not have access to underlying client data - and in some cases are legally barred from this data by program sponsors. Moreover, managers have little or no input in the design, creation, marketing or sale of wrap programs. The sponsors of the wrap programs carry out these functions and in no case does the manager use performance in any context besides the promotion of itself to the sponsor. As a result, it seems of little value to require managers to keep onerous "shadow" records for performance it never uses with respect to accounts over which it has little control with respect to many key features.

I believe AIMR should allow managers to present relevant performance for managed account program sponsors, given appropriate disclosures. In addition, I believe that July 1, 2003 is an unrealistic effective date for changes in performance reporting. A more equitable date would be no sooner than 18 months after their adoption by AIMR.

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