

Oslo, 21.12.2001

**INVITATION TO COMMENT: Global Investment Performance Standards (GIPS)
Guidance Statement on Composite Definition**

Dear Sir or Madame,

We would like to thank you for the opportunity to make comment to the Guidance Statement on Composite Definition to the GIPS Standards.

The Norwegian Society of Financial Analysts (Norske Finansanalytikers Forening, hereafter-named NFF) is the sponsor for GIPS in Norway.

Norsk GIPS as a Translation of GIPS was endorsed by IPC at the September meeting 2001.

Our comments are as follows:

- IPC: Do you agree with the principles established in the Guidance Statement?

NFF: Yes

- IPC: Do you agree with the treatment of portfolios that fall below a minimum asset level?

NFF: Yes

- IPC: Should firms be allowed to exclude a portion of a portfolio as non-discretionary?

NFF:

-Yes. One should consider meeting the requirements for carve-outs mandatory (3.A.7) for such exclusions, to avoid distortions from cash, cash equivalents and currency hedging when the exclusion is made. To make such exclusions for non-discretionary investments should be an option to the manager, not a requirement. The manager should be allowed to define the entire portfolio as non-discretionary, if wanted.

- IPC: How should portfolios with different measurement periods be treated?

NFF: No additional comments to the provisions.

- Do you agree with the proposed Implementation Date?

NFF: Yes, April 1, 2002.

Best regards,
The Norwegian Society of Financial Analysts

Gunnar Winther
Secretary General