

Association for Investment Management and Research  
Reference: AIMR-PPS standards - Wrap Fees  
P.O. Box 3668  
Charlottesville, Virginia 22903

Dear Sir/Madam:

I believe the performance reporting requirements for managed accounts, proposed in the AIMR-PPS Guidance Statement, do not adequately reflect the nature of wrap fee accounts. Therefore, I believe the Guidance Statement requirements are not appropriate for adoption.

It appears performance reporting requirements for traditional institutional accounts (where managers have full access to client data) are being extended to managed accounts. Record keeping and marketing practices of managed account programs are different from traditional institutional accounts. As I understand it, my firm, like many other wrap managers, does not have access to the underlying client data and in some cases is contractually barred from this access by the 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 propose that AIMR permit managers to present sponsor-specific performance for managed account program sponsors, subject to appropriate disclosure, and I also suggest that the effective date for managed account performance reporting requirements be postponed from July 1, 2003 (as currently proposed) to a date no sooner than 18 months following its adoption by AIMR.

Sincerely

Vinit Bodas, CFA