FORM BE-80
INSTRUCTION BOOKLET

Benchmark Survey of Financial Services Proving Institute Foreign Control of Servic

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INSTRUCTIONS

Purpose — Reports on this form are required in order to obtain reliable and up-to-date information on financial services transactions between U.S. financial services providers and unaffiliated foreign persons. The information will be used to formulate U.S. international economic policy, and to analyze the impact of that policy and the policies of foreign countries, on such international transactions. The data will also be used in compiling the U.S. balance of payments accounts and national income and product accounts.

Authority — This survey is authorized by Section 3103 of the International Investment and Trade in Services Survey Act (P.L. 94-472, 90 Stat. 2059, 22 U.S.C. 3101-3108, as amended), and by Section 5408 of the Omnibus Trade and Competitiveness Act of 1988 (P.L. 100-418, 15 U.S.C. 4908(c)). Regulations for the survey may be found in 15 CFR Part 801. The survey has been approved by the Office of Management and Budget under the Paperwork Reduction Act (44 U.S.C. 3501, et seq).

Penalties — Whoever fails to report may be subject to a civil penalty of not less than \$2,500, and not more than \$25,000, and to injunctive relief commanding such person to comply, or both. Whoever willfully fails to report shall be fined not more than \$10,000 and, if an individual, may be imprisoned for not more than one year, or both. Any officer, director, employee, or agent of any corporation who knowingly participates in such violations, upon conviction, may be punished by a like fine, imprisonment, or both. (See 22 U.S.C. 3105.) Notwithstanding the above, a U.S. person is not subject to any penalty for failure to report if a valid Office of Management and Budget control number is not displayed on the form; such a number (0608-0062) is displayed on this form.

Confidentiality — The International Investment and Trade in Services Survey Act provides that your report to this Bureau is CONFIDENTIAL and may be used only for analytical and statistical purposes. Without your prior written permission, the information filed in your report CANNOT be presented in a manner that allows it to be individually identified. Your report CANNOT be used for purposes of taxation, investigation, or regulation. Copies retained in your files are immune from legal process.

I. WHO MUST REPORT AND GENERAL COVERAGE

A. Who must report

- 1. Mandatory and voluntary reporting
 - a. Mandatory reporting A BE-80 report is required from each U.S. person who:
 - (1) is a financial services provider or intermediary (see I.B.1. of these Instructions), or whose consolidated U.S. enterprise includes a separately organized subsidiary, or part, that is a financial services provider or intermediary; and
 - (2) had transactions (either sales or purchases) directly with unaffiliated foreign persons in all financial services combined (see V. of these *Instructions*) in excess of \$3,000,000 during its 1999 fiscal year.

The \$3,000,000 threshold should be applied to financial services transactions with unaffiliated foreign persons by all parts of the consolidated U.S. enterprise that are financial services providers or intermediaries, regardless of whether the subsidiaries, or parts, file separate Forms BE-80(B). Because the \$3,000,000 threshold applies separately to sales and purchases, mandatory reporting may apply only to sales, only to purchases, or to both.

Determining whether a U.S. financial services provider or intermediary is subject to mandatory reporting may be based on the judgment of knowledgeable persons in a company who can identify reportable transactions with a reasonable degree of certainty, without conducting a detailed records search.

Complete Parts I and II of Form BE-80(A), and Parts I and II and the mandatory sections of the applicable schedule(s) of Form BE-80(B). Enter the total amounts of transactions applicable to a particular schedule in the appropriate column(s) on line 1 of the schedule. Distribute these amounts to the foreign country(ies) involved in the transaction(s).

b. Voluntary reporting — If your covered sales or purchases (see V. of these Instructions) are \$3,000,000 or less, you are requested to provide an estimate of the total for each type of service. Provision of this information is voluntary. The estimates may be judgmental. Because the \$3,000,000 threshold applies separately to sales and purchases, voluntary reporting may apply only to sales, only to purchases, or to both.

If you elect to file voluntarily, complete Parts I and II of Form BE-80(A), and Parts I and II and the voluntary section(s) of the appropriate schedule(s) of Form BE-80(B).

You may voluntarily report either:

- Estimated totals by type of service only on line 20 of Schedule A and/or B of Form BE-80(B); or
- Totals by type of service and a breakout by country in the mandatory section of Form BE-80(B).
- c. Exemption The \$3,000,000 exemption level for mandatory reporting is based upon total financial services purchased from, or sold to, unaffiliated foreign persons by all parts of the consolidated U.S. enterprise that are financial services providers or intermediaries combined, regardless of the number of subsidiaries or parts of the enterprise filing separate Forms BE-80(B). If you who do not meet the criteria for reporting in the mandatory section, and elect not to report data in the voluntary section of Form BE-80(B), you must complete the Exemption Claim on page 3 of Form BE-80(A).
- 2. Consolidation A consolidated U.S. enterprise may file a single, original copy of Form BE-80(B) covering combined (total) financial services transactions (purchases and sales) of all its subsidiaries, and parts, that are financial services providers or intermediaries, or it may file separate reports for its separately organized financial services subsidiaries and parts. In either case, Form BE-80(A) must also be completed for the consolidated U.S. enterprise.

B. General Coverage

1. Definition of financial services provider

Apart from the exclusion of Monetary Authorities (i.e., Central Banks) the definition of financial services providers used for this survey is identical in coverage to Sector 52 – Finance and Insurance – of the North American Industry Classification System United States, 1997

For example, companies and/or subsidiaries and other separable parts of companies in the following industries are defined as financial services providers: depository credit intermediation and related activities (including commercial banking, holding companies, savings institutions, check cashing, and debit card issuing); nondepository credit intermediation (including credit card issuing, sales financing, and consumer lending);

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I. WHO MUST REPORT AND GENERAL COVERAGE — Continued

B. General Coverage — Continued

Definition of financial services provider — Continued

securities, commodity contracts, and other financial investments and related activities (including security and commodity futures brokers, dealers, exchanges, traders, underwriters, investment bankers, and providers of securities custody services); insurance carriers and related activities (including agents, brokers, and services providers); investment advisors and managers and funds, trusts, and other financial vehicles (including mutual funds, pension funds, real estate investment trusts, investors, stock quotation services, etc.).

Filing options for holding companies that own only **non**financial subsidiaries:

- You may report your purchases of financial services from unaffiliated foreign persons on Form BE-80; or
- You may report such purchases on Forms BE-20 and BE-22, Benchmark and Annual Surveys of Selected Services Transactions With Unaffiliated Foreign Persons.

In either case, **sales** of financial services to unaffiliated foreign persons **must** be reported on Form BE-80 if they exceed \$3 million.

2. Clarification of general coverage, including special situations

- a. Report purchases or sales in the periods when they occur or are charged (that is, in the period when the provider of the service recognizes or performs the service), whether expensed by the purchaser of the service in that accounting period, amortized over several accounting periods, or included in expenses in a subsequent accounting period. For example, report payments of credit-related fees (and payments of securities brokerage commissions) in the period when credit-related (securities brokerage) services are charged, whether or not the charge for the service is included in the purchaser's expenses for that particular accounting period. See V. of these Instructions for an explanation of what measures should be applied in determining whether you are subject to the BE-80 survey's mandatory reporting requirements for a given type of service.
- **b.** Report covered transactions regardless of whether the service was performed in the United States or abroad.
- c. When a sale or purchase consists of services that are commingled or bundled (i.e., the different types of services are not separately billed), you should unbundle the transaction whenever possible. When the transaction cannot be unbundled, it should be classified based upon whichever service accounts for the largest share of its value. However, do not unbundle the transaction if the services are billed together because they are integral parts of the same transaction (for example, if the fee for financial management services includes payment for custody and other services that are regarded as integral parts of financial management services).

II. DEFINITIONS

A. Services mean economic activities whose outputs are other than tangible goods. This term includes, but is not limited to, banking, other financial services, insurance, transportation, communications and data processing, retail and wholesale trade, advertising, accounting, construction, design, engineering, management consulting, real estate, professional services, entertainment, education, and health care.

- B. Financial services include trading, issuing, dealing, underwriting, lending, custody, etc., of financial instruments; financial advisory or management services; credit card services; credit-related services (including establishing, maintaining, or arranging credits, letters of credit, lines of credit, mortgages, etc.); financial rating services; electronic funds transfer services; insurance services; etc. These services typically are performed by firms classified in Sector 52 Finance and Insurance of the North American Industry Classification System United States, 1997 (see I.B.1.). Some types of financial services are not covered on this survey. See V. of the Instructions for a list of financial services that are covered, and see VI. of the Instructions for a list of financial services that are not covered on this survey.
- C. U.S. Reporter means a U.S. person filing a report in this survey. On Form BE-82(A), the U.S. Reporter is the consolidated U.S. enterprise; on Form BE-82(B), the U.S. Reporter may be either the consolidated U.S. enterprise or a financial services subsidiary or part of a consolidated U.S. enterprise reporting separately.
- D. Consolidated U.S. enterprise means (i) a U.S. financial services provider, (ii) any U.S. corporation, proceeding up the financial services provider's ownership chain, that owns more than 50 percent of the voting securities of the corporation below it, and (iii) any U.S. corporation, proceeding down the ownership chain(s) of each of these corporations, whose voting securities are more than 50-percent-owned by the U.S. corporation above it.
- E. United States, when used in a geographic sense, means the several States, the District of Columbia, the Commonwealth of Puerto Rico, and all territories and possessions of the United States.
- **F. Foreign**, when used in a geographic sense, means that which is situated outside the United States or which belongs to or is characteristic of a country other than the United States.
- G. Person means any individual, branch, partnership, associated group, association, estate, trust, corporation, or other organization (whether or not organized under the laws of any State), and any government (including a foreign government, the United States Government, a State or local government, and any agency, corporation, financial institution, or other entity or instrumentality thereof, including a government sponsored agency).
 - United States person means any person resident in the United States or subject to the jurisdiction of the United States.
 - Foreign person means any person resident outside the United States or subject to the jurisdiction of a country other than the United States.
- H. Unaffiliated foreign person means, with respect to a given U.S. person, any foreign person that is not an affiliated foreign person as defined in paragraph I. below.
- I. Affiliated foreign person means, with respect to a given U.S. person, (i) a foreign affiliate of which the U.S. person is a U.S. parent, or (ii) the foreign parent or other member of the affiliated foreign group of which the U.S. person is a U.S. affiliate.
- J. Affiliate means a business enterprise located in one country that is directly or indirectly owned or controlled by a person of another country to the extent of 10 per centum or more of its voting stock for an incorporated business or an equivalent interest for an unincorporated business, including a branch.
 - Foreign affiliate means an affiliate located outside the United States in which a U.S. person has direct investment.
 - 2. U.S. affiliate means an affiliate located in the United States in which a foreign person has direct investment.

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II. DEFINITIONS — Continued

- K. Business enterprise means any organization, association, branch, or venture which exists for profitmaking purposes or to otherwise secure economic advantage, and any ownership of any real estate. (A business enterprise is a "person" within the definition in paragraph G. above.)
- L. Direct investment means the ownership or control, directly or indirectly, by one person of 10 per centum or more of the voting stock of an incorporated business enterprise or an equivalent interest in an unincorporated business enterprise.
- M. Parent means a person of one country who, directly or indirectly, owns or controls 10 per centum or more of the voting securities of an incorporated business enterprise, or an equivalent ownership interest in an unincorporated business enterprise, which is located outside that country.
 - U.S. parent means the U.S. person that has direct investment in a foreign business enterprise, including a branch.
 - 2. Foreign parent means the first person outside the United States that has direct investment in a U.S. business enterprise, including a branch.
- N. Affiliated foreign group means (i) the foreign parent, (ii) any foreign person, proceeding up the foreign parent's ownership chain, that owns more than 50 per centum of the person below it up to and including that person which is not owned more than 50 per centum by another foreign person, and (iii) any foreign person, proceeding down the ownership chain(s) of each of these members, which is owned more than 50 per centum by the person above it.
- O. Fiscal year is the U.S. Reporter's financial reporting year that has an ending date in calendar year 1999.
- P. Country means, for purposes of this survey, the country of location of the foreign person with whom a transaction has occurred.

III. GENERAL INSTRUCTIONS

A. Differentiating between U.S. and foreign persons

In II.G.2. of these **Instructions**, a "foreign person" is defined as any person resident outside the United States or subject to the jurisdiction of a country other than the United States. Persons who reside or expect to reside for 1 year or more in a foreign country are considered to be foreign persons. International organizations are considered to be foreign persons whether they are based in the United States (such as the International Monetary Fund, Inter-American Development Bank, United Nations, World Bank, and the Organization of American States) or abroad.

Use the following procedure to identify financial services transactions with unaffiliated foreign persons:

- Billing records or mailing address information to identify the country of the unaffiliated foreign person(s) – report receipts and payments with a given foreign country, or international organization, if the billing records or mailing address identify that foreign country as the location of the unaffiliated foreign person who was a party to the transaction.
- 2. IRS Form W-8, Certificate of Foreign Status filed by foreign persons, and IRS Form W-9, Request for Taxpayer Identification Number and Certification (filed by U.S. persons).
- Any other available information on residency of persons with whom you have sold or purchased financial services.

NOTE: Steps 1 and 2 above may be necessary when foreign customers provide billing addresses of U.S. agents or other locations of convenience in the United States. Also, for underwriting services it may be necessary to rely on additional information to correctly determine the residency of your customers in order to assure accuracy; for other types of services, it will probably be sufficient to use billing address information alone.

B. Who must report a transaction when an intermediary is involved

Financial services transactions between a U.S. person and a foreign person are frequently arranged by, billed through, or otherwise facilitated by, a financial services provider or intermediary. The intermediary may be U.S. or foreign, and may be affiliated or unaffiliated with the U.S., or the foreign, person. The U.S. financial services provider or intermediary who **directly** deals with an unaffiliated foreign person, and not the U.S. customer of the intermediary, is typically responsible for reporting the transaction on this survey.

Use the following guidelines to determine who should report data on payments of brokerage fees and commissions (service number 1) in cases where more than one U.S. financial services provider is involved in or knowledgeable about the transaction.

- Where a U.S. broker is involved in the transaction, the broker should report the data on payments of brokerage commissions.
- If a U.S. broker is not involved, a U.S. financial manager, such as a fund or investment manager, involved in the transaction should report the data.
- Where neither a U.S. broker nor a U.S. manager is involved in the transaction, a U.S. custodian should report; this would be the case, for example where the principal uses a foreign (rather than a U.S.) financial manager, but a U.S. custodian. (In this case, the custodian may wish to contact the principal to determine which of his financial managers are foreign persons.)
- If the custodian does not have or cannot obtain the information needed to report, then the U.S. principal, or his paying agent, should report the data; the U.S. principal must make the determination of whether he or his paying agent is responsible for reporting.

Respondents may deviate from these guidelines by agreement among themselves. Please confer with one another to assure that the data reported on payments of brokerage commissions are neither omitted from all BE-80 reports, resulting in under-counting of data, nor reported on more than one BE-80 report, resulting in duplication.

C. Distinguishing between affiliated and unaffiliated transactions

For purposes of reporting in this survey, it is necessary to distinguish between transactions between affiliated U.S. and foreign persons, and transactions between unaffiliated U.S. and foreign persons. Services transactions with affiliated foreign persons are reportable in other BEA surveys (see IV. of these Instructions). An unaffiliated foreign person is a foreign person that is neither the foreign affiliated foreign group) of the consolidated U.S. enterprise filing Form BE-80(A) of this survey. (See II.I., J., M. and N. in the Instructions.)

Transactions with unaffiliated foreign persons by or through a foreign activity of a U.S. person that is not a foreign affiliate of the U.S. person are deemed to be direct transactions of the U.S. person. Report such direct transactions in this survey.

If a U.S. person's foreign activity or operation is incorporated abroad, it is a foreign affiliate.

If a U.S. person's foreign activity or operation is NOT incorporated abroad, its status is based on the weight of the evidence when the following factors are considered.

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III. GENERAL INSTRUCTIONS — Continued

C. Distinguishing between affiliated and unaffiliated transactions — Continued

An unincorporated foreign activity or operation generally WOULD NOT be considered a foreign affiliate if it:

- conducts business abroad only for the U.S. person's account and not for its own account;
- 2. has no separate financial statements (including an income statement and balance sheet);
- receives funds to cover its expenses only from the U.S. person;
- 4. pays no foreign income taxes; and
- has limited physical assets, or employees, permanently located abroad.

Criteria for determining which U.S. activities do or do not constitute a U.S. affiliate of a foreign person are parallel to those listed above.

IV. RELATED FORMS

Persons receiving this form should be aware of other forms on services that are required to be filed on a mandatory basis with BEA (see 15 CFR, Part 801 and Part 806).

- **BE-20** Benchmark Survey of Selected Services Transactions
 With Unaffiliated Foreign Persons
- **BE-22** Annual Survey of Selected Services Transactions
 With Unaffiliated Foreign Persons
- **BE-29** Foreign Ocean Carriers' Expenses in the United States
- **BE-30** Ocean Freight Revenues and Foreign Expenses of United States Carriers
- **BE-36** Foreign Airline Operators' Revenues and Expenses in the United States
- **BE-37** U.S. Airline Operators' Foreign Revenues and Expenses
- **BE-47** Annual Survey of Construction, Engineering, Architectural, and Mining Services Provided by U.S. Firms to Unaffiliated Foreign Persons
- **BE-48** Annual Survey of Reinsurance and Other Insurance Transactions by U.S. Insurance Companies With Foreign Persons
- **BE-82** Annual Survey of Financial Services Transactions Between U.S. Financial Services Providers and Unaffiliated Foreign Persons
- **BE-93** Annual Survey of Royalties, License Fees, and Other Receipts and Payments for Intangible Rights Between U.S. and Unaffiliated Foreign Persons
- **BE-577** Direct Transactions of U.S. Reporter With Foreign Affiliate
- **BE-605** Transactions of U.S. Affiliate, Except a U.S. Banking Affiliate, With Foreign Parent
- **BE-605 Bank** Transactions of U.S. Banking Affiliate With Foreign Parent

The types of transactions reportable on those forms are not covered by this survey. To receive a copy of form BE-29, BE-30, BE-36, or BE-37, telephone BEA at (202) 606–9559. To receive a copy of form BE-20, BE-22, BE-47, BE-48, BE-82, or BE-93, telephone BEA at (202) 606–5588. To receive a copy of Form BE-577, telephone BEA at (202) 606–5566. To receive a copy of Forms BE-605 and BE-605 Bank, telephone BEA at (202) 606–5577.

Under the Treasury International Capital reporting system, the Department of the Treasury conducts mandatory surveys on the international financial position of the United States and on movements of portfolio investment capital between the United States and foreign countries that may give rise to financial services transactions. Inquiries about these surveys should be directed to the Federal Reserve Bank of New York (as fiscal agent for the Treasury Department) at (212) 720–7993.

V. SERVICES COVERED

This survey covers receipts (**Schedule A of Form BE-80(B)**) and payments (**Schedule B**) of fees and commissions for the following types of financial services:

1. Brokerage services, including foreign exchange brokerage services — Report on Schedule A your receipts of commissions and fees (inclusive of taxes and stamp duties) directly from unaffiliated foreign customers for executing orders to purchase or sell securities, options, futures, and other financial instruments. Also include fees and commissions on brokering foreign currencies. Report on Schedule B your payments of commissions and fees directly to unaffiliated foreign brokers for executing your, or your customers', orders.

Report origination fees in connection with over-the-counter derivative financial instruments only if the fees are separately identified in transaction documentation issued by the dealers in the instruments to the customers, and are not considered undifferentiated components of overall trading or marketmaking gains.

Do not report income where you were a dealer or other principal who was at risk of incurring a loss on the financial instruments rather than acting solely as a broker. For example, income from marking positions to market and inherent earnings from dealer markups on buy and sell transactions (i.e., bid/ask price spreads in dealing in foreign currencies, securities, and other financial instruments).

Report brokerage commissions for arranging joint ventures in service number 9, Other financial services. Report multi-currency conversion fees of credit card companies in service number 5, Credit card services.

Do not report fees for commodity or merchandise brokerage services, real estate brokerages, and business services brokerage because they are not considered to be financial services (as opposed to fees for purchasing or selling commodity futures and other financial instruments which are reportable in this survey).

2. Underwriting and private placement services — Report underwriting services earnings from buying and reselling an entire or substantial portion of newly issued securities. Report on Schedule A as negative receipts your losses from purchasing securities from an unaffiliated foreign person (issuer or lead underwriter) and reselling them at a lower price. (This is the only financial service category where negative amounts may be reported.)

Also report fees you received from an unaffiliated issuer of securities for privately placing its securities, or fees that you paid to an unaffiliated foreign person who privately placed your securities, including fees on dealer-placed commercial paper. Do not report earnings from buying and selling (i.e., trading) commercial paper or other securities for your own account, because they are not considered to be financial services.

Where you are lead underwriter, report separately your receipts of underwriting fees and payments of selling concessions and other expenses. Report on Schedule A your underwriting fees, before deduction of selling concessions paid to other members of the syndicate, according to the country of the person (issuer) from whom you purchased the securities. Report on Schedule B your selling concessions and reimbursements for expenses paid by you to unaffiliated foreign members of the syndicate based upon the country(ies) of the foreign syndicate members receiving these sums.

V. SERVICES COVERED — Continued

Where you are a syndicate member other than the lead underwriter, report on Schedule A selling concessions received by you based upon the country of the lead underwriter.

Report payments of underwriting fees (on Schedule B) by an issuer of securities as:

The estimated gross proceeds to the foreign lead underwriter from the sale to the public of the securities – base this estimate on the number of units of securities sold times the per unit public offer price

minus

The net proceeds received by the issuer from the foreign lead underwriter.

Classify these payments according to the country of the foreign lead underwriter.

Report fees or commissions received by, or paid to, intermediaries that arrange the sale of securities (including mutual fund shares) they do not themselves own as brokerage services (under service number 1) rather than as underwriting services.

3. Financial management services — Report services in which the provider of the service has the authority to direct the use or investment of funds or other assets. Report fee income from (to) unaffiliated foreign persons for managing or administering financial portfolios, such as cash, securities, futures, and other financial instruments or assets, if you (they) have this authority. Report the fees under service number 6, financial advisory and custody services if a U.S. or foreign person has input into the decision-making process but does not have this authority. Report these fees whether or not the assets are in the custody of the manager or in the custody of another U.S. or foreign person whom the manager directs. Report fees from actively managed accounts (where research and market timing skills are also provided) and fees from passively managed, or indexed, accounts.

U.S. persons (including trustees and fiduciaries with management authority) should report on Schedule A their fees from managing **foreign** commodity pools, mutual funds, hedge funds, trusts (including trusts containing mortgages), etc., (which are considered foreign persons). Do not report fees from managing U.S. mutual funds, hedge funds, trusts (including trusts containing mortgages), etc., (which are considered U.S. persons) **unless** the management fee is charged directly to a foreign investor, owner, beneficiary, maker, etc., of the U.S. mutual fund, hedge fund, or trust rather than charged to the U.S. mutual fund, etc., itself.

Report under service number 6, financial advisory and custody services, receipts from and payments to unaffiliated foreign persons (including unaffiliated foreign-based custodians or subcustodians) for managing the custody or safekeeping of securities.

Foreign participation in U.S. futures markets frequently occurs indirectly, by foreign persons investing directly in a foreign commodity pool that, in turn, invests directly in the U.S. futures market. Foreign commodity pools may be organized by U.S. commodity pool operators (CPO's), such as U.S. brokerage institutions. U.S. CPO's report on Schedule A fees from managing foreign commodity pools, including additional management fees received based upon positive returns. Exclude gains and losses to principal amounts you have invested in the pool; in this case, your earnings are considered to be capital gains, which are not covered on Schedules A and B. (Similar guidelines pertain to the earnings

of U.S. persons who manage foreign hedge funds; i.e., report management fees including additional fees based on positive returns, but do not report gains or losses to principal amounts invested in the funds.)

Do not report receipts (payments) of your foreign affiliates from (to) foreign persons. For example, where your foreign affiliate manages foreign assets, do not report the management fee paid by foreign clients to your foreign affiliate because the fee was not received by the U.S. Reporter from an unaffiliated foreign person. (See II. and III. of the **Instructions** for a discussion of foreign activities of a U.S. person that constitute a foreign affiliate.) Similarly, do not report fees paid by you to, or received by you from, a U.S. affiliate of a foreign person.

Do not report funding for foreign sales promotion and representative offices in this survey. Report such funding on Form BE-20 or BE-22.

- 4. Credit-related services, except credit card services Report fees received from or paid to unaffiliated foreign persons, including fees paid directly and fees that are withheld or deducted from the proceeds for:
 - Credit-related or lending-related services, such as fees for renegotiating debt terms and fees for establishing/originating, maintaining, accepting or arranging standby letters of credit
 - Commercial and similar letters of credit
 - Letters of indemnity
 - · Lines of credit
 - Participations in acceptances
 - Mortgages
 - · Credit facilities
 - Reimbursement commissions for honoring import letters of credit (ILC's), and of discrepancy fees for financial services provided when goods imported under ILC's do not fully meet specifications
 - Factoring services
 - Issuing financial guarantees and loan commitments (to make or purchase loans)
 - Arranging or entering into financial lease contracts
 - Credit-related services received by, or paid to, note issuance facilities (NIF's)

Do not report underwriting fees on notes issued by NIF's (these should be reported under service number 2, underwriting services). Also, do not report interest received or paid, including discounts and premiums on notes purchased or sold.

If you are a member of a loan syndicate, or of loan participations other than syndicates, report fees received and paid for organizing, managing, or participating in the operation. Do not report the sale of assets (i.e., of parts or shares in the syndicated loan), because these are not financial services. Where you have collected a fee from an unaffiliated foreign person on a loan syndication and passed through a portion of the fee to foreign syndicate members, report the total fee you received on Schedule A and report the portion of the fee you passed through on Schedule B. Borrowers under loan syndicates or loan participations other than syndicates should report payments of fees according to the country of the lead manager of the syndicate.

Report payments of credit-related fees in the accounting period in which the fee is assessed by the provider of credit-related services, whether included in expenses for that particular accounting period or amortized over several accounting periods.

V. SERVICES COVERED — Continued

If compensating balances are reflected in the cost of credit-related services, report the (net) amount received or paid for credit-related services after credit for the value of the compensating balances. Do not report the value of the compensating balance to the bank (in the form of foregone interest expense). If the bank returns some portion of its savings to its customers in the form of a credit against other financial services provided, the amount to report for the other financial services provided should be the reduced charge after consideration of this credit.

 Credit card services — Report all cross-border receipts and payments for credit card services, whether paid separately or in the form of a discount from face or par value.

U.S. credit card companies must report specified transactions in which they themselves engage with unaffiliated foreign persons, as well as specified transactions of their independent issuers or acquirers with foreign persons. To avoid duplication, their independent credit card issuers and acquirers are exempt from reporting data on these credit card services.

Listed below are the major types of credit card services sold to or purchased from unaffiliated foreign persons. The credit card company must report separately total receipts and payments through the system it controlls or monitors. Total receipts (or total payments) of credit card services are the sum of receipts (or payments) from all of these services combined.

- Transaction and service fees received from or paid to foreign acquirers and issuers
- Interchange received from foreign acquirers or paid to foreign issuers
- Discount (including interchange and overhead assessments, reimbursements for telecommunication services, etc.) received from or paid to foreign acquirers and issuers
- Payments to foreign issuers, acquirers, or merchants under guarantees to protect them from losses from a default in the processing network
- Fees you received from foreign issuers for credit authorization services
- Fees you received from foreign issuers for listing lost or stolen credit card numbers in warning bulletins or on electronic files
- Resignation assessments or membership fees received from foreign issuers and acquirers
- Multi-currency conversion fees received from foreign issuers or paid to foreign acquirers, processing centers, or issuers

Independent issuers, acquirers, and processors must report credit card services that are conducted outside the system controlled or monitored by the credit card companies. Such transactions may include annual dues and other fees received by issuers from cardholders, payments to processors by independent issuers and acquirers, and any interchange reimbursements that do not go through the credit card system.

Do **not** report receipts or payments for credit card enhancements, such as travel insurance, extended warranties, and discounts on tour packages or other purchases.

- 6. Financial advisory and custody services Report receipts from and payments to unaffiliated foreign persons (including unaffiliated foreign-based custodians or subcustodians) for managing the custody or safekeeping of securities. Include the following:
 - Financial advisory services on mergers and acquisitions
 - · Investment newsletters or investment advice
 - Commodity trading advisory services
 - Proxy voting advisory services
 - Custody services (including payments and settlements services such as mortgage servicing services)
 - Other advisory and custody services provided by U.S. or foreign persons who have no discretion, or who have very limited discretion, to act independently from instructions provided by the investor or another principal

Exclude services where you are at risk or incurring a loss, such as underwriting services (service number 2).

U.S. issuers of American Depositary Receipts (ADR's) and American Depositary Shares (ADS's) – Report on Schedule B your payments to unaffiliated foreign correspondent institutions for holding the securities backing the ADR's and ADS's. U.S. issuers of ADS's should also report, on Schedule A, any receipts of sponsorship fees from unaffiliated foreign persons.

Do not report fees received from or paid to a U.S. subsidiary (or U.S. affiliate) of a foreign person, because, under balance of payments conventions, these are considered U.S., not foreign, persons.

Where you do have complete (or substantially complete) discretion to act independently from instructions provided by investors or other principals, report your receipts under service number 3, financial management services. Where you are an investor or principal, and an unaffiliated foreign person has complete (or substantially complete) discretion to act independently on your behalf, report your payments under service number 3.

- 7. Securities lending services U.S. securities lenders and borrowers, and their agents, should report amounts received directly from, or paid directly to, unaffiliated foreign persons, for lending or borrowing securities. Report fees received by or paid to principals or agents for arranging loan terms and conditions, monitoring the value of collateral, providing guarantees against default, and providing other securities lending services. Report rebates received or paid on "borrow versus cash transactions." Do not report amounts received from, or paid to, unaffiliated foreign persons by a U.S. or foreign agent upon the default of a customer, because such payments are not considered to be for financial services. Do not report interest under repurchase or reverse repurchase agreements, because interest is not reportable (although, as mentioned, rebates are reportable) on this form.
- 8. Electronic funds transfer services Report fees for the electronic funds transfers of money or financial assets received directly from, or paid directly to, unaffiliated foreign persons. Include payments to SWIFT, in Belgium.

Page 10 BE-80(I) (11/99)

V. SERVICES COVERED — Continued

- 9. Other financial services (Specify primary type(s) in comments section of Schedule A or B, as appropriate.) —
 Report the total amount of fees you received from or paid to unaffiliated foreign persons for all other financial services combined. Report the type(s) of service(s) accounting for the largest share of the data being reported in the space provided at the bottom of the schedules. Examples of services that may be reported under this category include:
 - · Asset pricing services
 - · Security exchange listing fees
 - · Demand deposit fees
 - · Securities rating services
 - Check processing fees
 - Mutual fund exit fees, load charges and 12b–1 service fees
 - · Security redemption or transfer services
 - · ATM network services
 - Securities or futures clearing and settling services
 - Brokerage services not covered above, such as for arranging joint ventures

Do not report real estate brokerage fees (real estate services), business brokerage fees (business services), and commodity or merchandise brokerage fees (wholesale or retail trade services), because these are not considered financial services.

Note that some types of financial services are not covered on this form. See VI. of the **Instructions** for a list of types of financial services not to be reported.

VI. TYPES OF FINANCIAL SERVICES EXCLUDED FROM COVERAGE

Do not report the following types of financial services on this survey:

- A. Stock quotation and financial information services These are instead covered by Form BE-20 or BE-22, under data base and other information services.
- B. Insurance premiums and losses, and commissions on insurance These are covered on other BEA forms. (See IV. of these Instructions for information on whom to call regarding these forms.) Charges at the individual policy level also are not covered.
- C. Annuity purchases and payments to annuitants Annuity purchases and payments to annuitants are not covered. Also, charges at the individual policy level, including insurance-company fees on variable annuities, are not covered.
- D. Pension fund contributions and benefits Pension fund contributions and pension benefits are not covered. However, U.S. pension funds may engage in other financial services transactions that are reportable on this form, including payments of brokerage commissions and fees for investment management or financial advisory services to unaffiliated foreign persons.
- E. Interest and dividend receipts and payments Under balance of payments conventions, interest and dividends are considered to be investment income rather than income from services, and are therefore not covered.
- F. Premiums and other proceeds from writing (selling) options, forwards, futures, and swaps Premiums from writing options, and fees and other proceeds from writing forwards, futures, and swaps are not covered. (However, explicit brokerage commissions on transactions in these financial instruments are covered under service number 1, brokerage services.)

- G. Earnings of principals from buying and selling (including dealing, trading, holding, or arbitrage) of financial instruments, except foreign currency exchange transactions Under balance of payments conventions, these types of earnings are considered to be "capital gains" (i.e., earnings that are not from current production) rather than payments for financial services, and are therefore not covered. However, underwriting is considered to be a financial service, and is covered under service number 2.
- H. Foreign currency exchange transactions Bid/ask price spreads and trading profits on currency exchange transactions are not covered. However, explicit commissions paid to currency exchange brokers are covered under service number 1, brokerage services.

VII. REPORTING PROCEDURES

- A. Due date Your report is due March 31, 2000.
- **B. Fiscal year reporting period** This report covers fiscal year 1999, which is your most recent fiscal year that ended on or before December 31, 1999.
- C. Extension Requests for an extension of the reporting deadline will not normally be granted. However, in a hardship case, a written request (including a Fax) for an extension will be considered if it is received at least 15 days before the due date. BEA will provide a written response to such a request.
- **D. Assistance** For assistance or additional copies of the forms, telephone (202) 606–5588 between 8:00 a.m. and 4:00 p.m., eastern time, or fax your request to (202) 606–5318.
- E. Original and file copies File a single original copy of each form (including Form BE-80(A) and, if appropriate, one or more Forms BE-80(B)) with BEA. Please use the copy with the address label if such a labeled copy has been provided. Companies that elect to file separate reports for their separately organized financial services subsidiaries or parts must file a separate original copy of Form BE-80(B) for each separate subsidiary or part. In addition, retain a copy of each report in your files to facilitate resolution of problems; these copies should be retained by the U.S. Reporter for a period of not less than 3 years beyond the report's original due date. In order to facilitate survey processing, BEA requests that respondents assemble together and file in a single packet Form BE-80(A) and all Forms BE-80(B) for their enterprise.
- **F. Where to send the report** Send reports filed by mail through the U.S. Postal Service to:

U.S. Department of Commerce Bureau of Economic Analysis BE-50(SSB) Washington, DC 20230

Send reports filed by direct private express delivery to:

U.S. Department of Commerce Bureau of Economic Analysis, BE-50(SSB) Shipping & Receiving Section, M-100 1441 L Street, NW Washington, DC 20005

G. Estimates — If actual figures are not available, supply estimates and label them as such. When data items cannot be fully subdivided as required, report totals and an estimated breakdown of the totals.

BE-80(I) (11/99)

FORM BE-80(A) (Report for Consolidated **U.S. Enterprise**)

U.S. DEPARTMENT OF COMMERCE BUREAU OF ECONOMIC ANALYSIS

MANDATORY — CONFIDENTIAL BENCHMARK SURVEY OF FINANCIAL SERVICES TRANSACTIONS BETWEEN U.S. FINANCIAL SERVICES PROVIDERS AND UNAFFILIATED FOREIGN PERSONS — 1999

MAIL REPORTS TO

U.S. Department of Commerce Bureau of Economic Analysis BE-50(SSB) Washington, DC 20230

OR

DELIVER **REPORTS** TO

U.S. Department of Commerce Bureau of Economic Analysis BE-50(SSB) Shipping & Receiving, Room M-100 1441 L Street, NW Washington, DC 20005

Public reporting burden for this collection of information (consisting of Form BE-80(A) and, as appropriate, one or more Forms BE-80(B)) is estimated to vary from 4 to 150 hours per response, with an average of 7 hours per response, including time for reviewing instructions, parts of the consolidated U are not the top U.S. prontact your top parnits of the enter searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate, including suggestions for reducing this burden, to Director, Bureau of Economic Analysis (BE-1), U.S. Department of Commerce, Washington, DC 20230; and to the Office of Management and Budget, Paperwork Reduction Project 0608-0062, Washington, DC 20503.

BEA USE ONLY

Part I NAME, ADDRESS, AND DETERMINATION OF REPORTING STATUS

 Name and address of the consolidated U.S. enterprise — Enter or correct as necessary.

Form BE-80(A) covers all subsidiaries and parts of the consolidated U.S. enterprise that are financial services providers or intermediaries. If you are not the top U.S. parent corporation in the consolidated enterprise, you may need to contact your top parent corporation to ensure that the information provided is for all reportable units of the enterprise combined.

- A. Due date A completed Form BE-80, consisting of Form BE-80(A) and, as appropriate, one or more Forms BE-80(B), is due March 31, 2000.
- B. What to file All persons who receive copies of this survey must complete Part I of Form BE-80(A). All persons subject to the mandatory reporting requirement must also complete Part II of Form BE-80(A), and Parts I and II and the mandatory section(s) of the appropriate schedule(s) of Form BE-80(B). Persons who are exempt from the mandatory reporting requirement but elect to report data voluntarily are asked also to complete Part II of Form BE-80(A), and Parts I and II and the voluntary section(s) of the appropriate schedule(s) of Form BE-80(B). Persons who receive this form but are exempt from mandatory reporting and do not wish to report data voluntarily must complete Part I of Form BE-80(A) and the Exemption Claim. In order to facilitate survey processing, respondents should file a single packet consisting of Form BE-80(A) and all Forms BE-80(B) for their enterprise.
- C. Assistance Telephone (202) 606-5588 between 8:00 a.m. and 4:00 p.m., eastern time for assistance or additional copies of the forms.
- D. Original and file copies You should file with BEA a single original copy of the survey (including Form BE-80(A) and, as appropriate, one or more Forms BE-80(B)). Please use the copy with the address label if such a labeled copy has been provided. You must retain a copy of each report to facilitate resolution of problems.
- E. Where to send the report Reports filed by mail through the U.S. Postal Service should be sent to U.S. Department of Commerce, Bureau of Economic Analysis BE-50(SSB), Washington, DC 20230. Reports filed by direct private delivery should be directed to U.S. Department of Commerce, Bureau of Economic Analysis BE-50 (SSB), Shipping and Receiving Section, Room M-100, 1441 L Street, NW, Washington, DC 20005.
- F. Estimates If actual figures are not available, supply estimates and label them as such. When data items cannot be fully subdivided as required, report totals and an estimated breakdown of the totals.

PERSON TO CONSULT CONCERNING QUESTIONS ABOUT THIS FORM BE-80(A) REPORT — Enter name and telephone number.				CERTIFICATION — The undersigned official certifies that this report has been prepared in accordance with the applicable instructions, is complete, and is substantially accurate except that, in accordance with VII.G of the Instruction Booklet , estimates have been provided where data are not available from customary accounting records or precise data could not be obtained without undue burden.					
Name				Authorized official's signature					
TELEPHONE NUMBER	Area code	Number	Extension	Print or type name and title	Date				

NAME, ADDRESS, AND DETERMINATION OF REPORTING STATUS — Continued Part I

2. Determination of reporting status

A U.S. person that is a financial services provider (or whose consolidated enterprise includes a subsidiary, or part, that is a financial services provider) may be required to report. A BE-80 report (consisting of a Form BE-80(A) and one or more Forms BE-80(B)) **must** be filed if transactions (either sales or purchases) with unaffiliated foreign persons in all types of covered financial services combined (see V. of the **Instruction Booklet**) by all financial services providers within a consolidated U.S. enterprise exceed \$3 million during the U.S. person's fiscal year 1999. The \$3 million threshold applies separately to sales and purchases. The mandatory reporting requirement may apply only to sales, only to purchases, or to both. In determining reporting status, you may use estimates of sales and purchases that are not based on a search of accounting records. Estimates may be based on the recollection of knowledgeable persons within the company who are in a position to know whether the company engaged in any significant transactions in financial services during the year and the approximate total value of such transactions.

If your total transactions (either sales or purchases) with unaffiliated foreign persons in all types of financial services combined, by all financial services providers within your enterprise, are \$3 million or less during fiscal year 1999, you may voluntarily report either:

Estimated totals by type of service only on line 20 of Schedule A and/or B of Form BE-80(B); or

	• Tota	als by type of service and a breakout by country in the mandatory section of Form BE-80(B).
	NOTE: may a	: Because the \$3 million threshold app <mark>lies separately to sales and purchases, voluntary reporting apply only to sales, only to purchases, or to both.</mark>
	Filing c	options:
	• A se cons	eparate Form BE-80(B) may be filed for each separately organized financial services subsidiary, or part, of a isolidated U.S. enterprise; or
		ingle Form BE-80(B) may be filed combining all covered transactions by all financial services subsidiaries, or parts, a U.S. enterprise.
		her case, the Determination of Reporting Status below should be based on the fully consolidated enterprise, including the top U.S. parent and all of its U.S. subsidiaries and parts.
	Report	ting status
	Mark (X	X) one:
	10001	The consolidated U.S. enterprise (including the top parent and all of its U.S. subsidiaries and parts, whether reporting together or separately) is required to report data in the mandatory section of at
		least one Form BE-80(B). Proceed to item 3 of this Port
		The consolidated U.S. enterprise (including the top parent and all of its U.S. financial subsidiaries and parts, whether reporting
		together or separately) is not required to report data in the
		mandatory sections of Form BE-80(B) but elects to report data voluntarily.
		The consolidated U.S. enterprise is not reporting data in either the mandatory or voluntary section of Form BE-80(B). — Complete the Exemption Claim on page 3;
		SKIP item 3 of this Part.
3.	Employ	oyer Identification Number (EIN) of the consolidated U.S. enterprise.
		Primary EIN —
	12000	Filliary Eliv —
	10002	
		Additional EIN (if available) —
		Additional Env (ii available) —
	10003	
		20001

10003	Addition	al El	N (i	if av	raila	ible)															
BEA USE Page 2	20001 ONLY	1															FC	DRM	BE-80((A) (11	/99

financial services providers within t BE-80(B). If you are filing only a sing	(X) box 1 or box 2 in Part I, item 2. List below the name(s) of the he consolidated U.S. enterprise that are reporting separately on Form gle Form BE-80(B) covering all financial services providers of the ned, only one entry should appear below. Use additional copied sheets
BEA USE ONLY	Name(s) of U.S. Reporters filing separate Form(s) BE-80(B) —
10004	1.
10005	2.
10006	3. Jours Ul. Heurs.
10007	4. is no ses at sporte
10008	5. form our pare as rest
10009	6. Vey tion the survey
10010	57. rmaley to for
10011	18.15 CULY #1011
10012	(Suctorules
10013	10
Neither the consolidated U.S. enterpris Form BE-80(B) because the consolidated Mark (X) appropriate box. 10014 1 Was not in existence at a Had no subsidiaries or p 1 Had no transactions, either unaffiliated foreign personal transactions, either mandatory reporting requesceded \$3 million (See purchases of financial set that are financial service data voluntarily. The total	any time during the reporting period. arts that were financial services providers. her sales or purchases, of the types of financial services covered, with
¹ 5 □ Other — Specify _▼	
NOTE If you marked (X) a box in this	Exemption Claim, your enterprise should not complete any Forms BE-80(B).

LIST OF ALL FINANCIAL SERVICES PROVIDERS REPORTING SEPARATELY

Part II

FORM BE-80(A) (11/99) Page 3

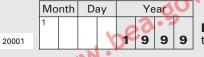
						- PP P	
FORM BE-80 (11/99)	(B) (Report for Provider)	Financial Services	BEA USE (ONLY Control number			В
U.	.S. DEPARTMENT OF	- COMMERCE	Part I ID	ENTIFICATION OF FINANCI	AL SERVICES	S PROVIDER	
BEN FI	ICHMARK S	ONFIDENTIAL URVEY OF	the U.S. financial name an	nd address of U.S. Reporter person filing this report. If this services subsidiary, or part, or d address of the subsidiary, or l. If an address label is affixed,	report is for a f a consolidate r part, that is re	n separately org ed enterprise, ge eporting on this	anized ive the s Form
FI PROVII	NANCIAL S	ERVICES JNAFFILIATED			sel 19		¥ G •
	U.S. Department Bureau of Econo BE-50(SSB) Washington, DC	omic Analysis		is no 101	es only	nond	Jents
	OR			" " " " " " " DO"	e at	cesy	
TO TO	U.S. Departmen Bureau of Econo BE-50(SSB) Shipping & Rece 1441 L Street, N Washington, DC	omic Analysis eiving, Room M-100 IW	nthe,	olidated U.S. enterprise of If the U.S. person named a	urvey	respond	
Repor separa name a this ite	ter identified tely organized and control numer. See the adders of the U.S. e	above is a subsidia financial services sub mber (if known) of the dress label that may b	e consolida e affixed to	part, of a consolidated U.S. ented U.S. ented U.S. enterprise; otherwise, o Form BE-80(A), Part I, item 1,	iterprise, give . do not compl	lne ete	
	Name	804,					
	Forms BE	-80(B), is due March 3	1, 2000. 606–5588	nsisting of Form BE-80(A) and, between 8:00 a.m. and 4:00 p.			
	IMPORTA	ANT NOTE					
) for the consolidated U.S. bus es and parts) BEFORE comple			
	If you are	required to report dat	a or elect t	o report data voluntarily, you	may either:		
	File a s or	eparate form BE-80(B) for each s	eparately organized financial s	services subsid	diary, or part;	
	 File a s subsidi 	ingle BE-80(B) represe aries, or parts.	enting the s	sum of all covered transactions	s by all financi	al services	
		ber of Forms BE-80(of Form BE-80(A).	B) you file	e must agree with the numb	er of U.S. Re	porters listed	
QUESTIC	ONS ABOUT 1	T CONCERNING FHIS FORM BE-80(B) the and address.		CERTIFICATION — The und has been prepared in accord complete, and is substantiall with VII.G of the Instruction provided where data are not records or precise data could	ance with the y accurate exc n Booklet , est available from d not be obtain	applicable instreept that, in accimates have be customary ac	ructions, is ordance en counting
				Authorized official's signature	е		
TELEPHO NUMBER		Number	Extension	Print or type name and title			Date

Part I IDENTIFICATION OF FINANCIAL SERVICES PROVIDER — Continued

- A. What to file All persons who receive copies of this survey must complete Part I of Form BE-80(A). All persons subject to the mandatory reporting requirement must also complete Part II of Form BE-80(A), and Parts I and II and the mandatory section(s) of the appropriate schedule(s) of Form BE-80(B). Persons who are exempt from the mandatory reporting requirement but elect to report data voluntarily are asked also to complete Part II of Form BE-80(A), and Parts I and II and the voluntary section(s) of the appropriate schedule(s) of Form BE-80(B). Persons who receive this form but are exempt from mandatory reporting and do not wish to report data voluntarily must complete Part I and the Exemption Claim on Form BE-80(A). In order to facilitate survey processing, respondents should file a single packet consisting of Form BE-80(A) and all Forms BE-80(B) for their enterprise.
- **B. Original and file copies** You should file with BEA a single original copy of the survey (including Form BE-80(A) and, as appropriate, one or more Forms BE-80(B)). Please use the copy with the address label if such a labeled copy has been provided. You must retain a copy of each report to facilitate resolution of problems.
- C. Where to send the report Reports filed by mail through the U.S. Postal Service should be sent to U.S. Department of Commerce, Bureau of Economic Analysis BE-50(SSB), Washington, DC 20230. Reports filed by direct private delivery should be directed to U.S. Department of Commerce, Bureau of Economic Analysis BE-50(SSB), Shipping and Receiving Section, Room M-100, 1441 L Street, NW, Washington DC 20005.
- **D. Estimates** If actual figures are not available, supply estimates and label them as such. When data items cannot be fully subdivided as required, report totals and an estimated breakdown of the totals.
- E. Currency amounts Report in thousands of U.S. dollars (omitting 000). EXAMPLE If the amount is \$3,000,000, report as \$3,000. If an amount is less than \$500.00 enter "0."

Part II

1. Report for fiscal year ending



Fiscal year 1999 is the U.S. Reporter's financial reporting year that has an ending date in calendar year 1999.

- 2. Industry classification Enter the 4-digit code from the Guide to Industry and Foreign Trade Classifications for International Surveys in which the U.S. Reporter's sales or gross operating revenues are largest.
 - Where the consolidated U.S. enterprise is filing a single Form BE-80(B) Give the industry classification of the consolidated U.S. enterprise.
 - Where the consolidated U.S. enterprise is filing more than one Form BE-80(B) Give the industry classification of the subsidiary, or part, being reported on this Form BE-80(B).

20002	1		

3. Primary Employer Identification Number used by the U.S. Reporter named in Part I, item 1 of this Form BE-80(B).

20004	1	_				

Part II Continued

SCHEDULE A — Receipts of Fees and Commissions From Unaffiliated Foreign Persons for Financial Services

Complete the mandatory section of Schedule A for each type of financial service listed below if total sales to unaffiliated foreign persons of all types of financial services combined by all subsidiaries and parts of the consolidated U.S. enterprise that are financial services providers or intermediaries exceed \$3,000,000. The voluntary section is **requested** to be completed if total sales to unaffiliated foreign persons of all types of financial services combined by all subsidiaries and parts of the consolidated U.S. enterprise that are financial services providers or intermediaries are \$3,000,000 or less.

Enter the number associated with the type of financial service, instead of the complete title of the service, in the column heading of Schedule A. See V. of the **Instruction Booklet** for complete descriptions of the types of financial services covered.

Enter the names of countries not on the preprinted list, as appropriate, in the left hand margin of Schedule A. Report transactions with international organizations; identify these transactions as being with "Int'l Org." Use additional copied sheets to list additional countries, as necessary.

Service number	Service for
1	Brokerage services, including foreign exchange brokerage services
2	Underwriting and private placement services
3	Financial management services
4	Credit-related services, except credit card services
5	Credit card services
6	Financial advisory and custody services
7	Securities lending services
8	Electronic funds transfer services
9	 Other financial services If you use this service number — Enter on the schedule the total amount of fees you received for all other financial services combined. See V. of the Instruction Booklet for examples of types of financial services to report under this service number. If you reported data in the mandatory section of Schedule A under this service number — Enter a brief description of the primary type(s) of service(s) sold. ▼

Par	Continued								A1
	SCHEDU	JLE A	\ — Re	ceip	ets of Fees and ns for Financial	Commissions Services	From Unaffiliat	ted Foreign	AI
						REPORT IN	THOUSANDS O	F U.S. DOLLARS	
	RECEIPTS FROM			A SE LY	Service number:	Service number:	Service number:	Service number:	Service number:
			(1)	(2)	(3)	(4)	(5)	(6)	(7)
B/I A	NDATORY		1	2	3	4	5	6	7
Con of fe by t ente \$3,0 con	nplete if total receipts ees and commissions the consolidated U.S. erprise exceed 100,000. Also nplete question 21, as	A1000				rm is no	ooses of	· respo	indents
' '	ropriate.		1	2	3	4 OU	5 21	6	7
	All countries, total	001	1	2	3.18	4011	5	6	7
	Belgium Canada	002	1 30: 1 10:		3	4	5	6	7
	France	003	1 30		3	4	5	6	7
	Germany	005	1 30	-	3 0	4	5	6	7
	Hong Kong	006	¹ 61	_	3	4	5	6	7
	Italy	007	1 31		3	4	5	6	7
	Japan	007	9 61		3	4	5	6	7
	Netherlands	009	1 (31)		3	4	5	6	7
	Singapore		¹ 62		3	4	5	6	7
		010		_	3	4	5	6	7
11.	United Kingdom	011	1 32	10		7	9		,
	Other — Specify (Use additional copied sheets as necessary.)	9	1	2	3	4	5	6	7
12.	her	012							
13.	2N • V	013	1	2	3	4	5	6	7
14.		014	1	2	3	4	5	6	7
15.	N	015	1	2	3	4	5	6	7
16.		016	1	2	3	4	5	6	7
17.		017	1	2	3	4	5	6	7
18.		018	1	2	3	4	5	6	7
19.		019	1	2	3	4	5	6	7
Con fees con	/OLUNTARY Complete if total receipts of lees and commissions by the consolidated U.S. enterprise lare \$3,000,000 or less. NOTE — If total receipts for all financial services combined exceed \$3 million – You must complete the MANDATORY section above, and line 20 must be left blank.								n – You must ft blank.
20.	All countries, total	020	70	9 2	3	4	5	6	-
M	• If you unde • If you unde • If you unde	u are serv u are serv er serv age 3	subjec vice nu subjec vice nu of this	t to t mbe t to t mbe s forr		item 21. datory reporting he primary type(g requirement an (s) of service(s) i	nd you entered d n the space prov	ata
21.	ii you reported data in t	me m	anudic	лу S	ection of Schedu	ie A under servi	ce number 1, bro	relage	

services — Enter the approximate amount of the total for all countries combined that was for transactions in each of the following groups of financial products. (Estimates may be based upon the judgment of knowledgeable persons, without conducting a detailed records search.)	thous	oort in sands of dollars (1)
a. Long-term securities (stocks and bonds, including collateralized mortgage obligations, with no original maturity or with original maturity of more than 1 year)	1	
b. Long-term and short-term derivative products (i.e., options, futures, swaps, forwards, and warrants)	1	
c. Other (such as commercial paper, bankers acceptances, and foreign exchange brokerage)	1	

Part II Continued

SCHEDULE B — Payments of Fees and Commissions to Unaffiliated Foreign Persons for Financial Services

Complete the mandatory section of Schedule B for each type of financial service listed below if total purchases from unaffiliated foreign persons of all types of financial services combined by all subsidiaries and parts of the consolidated U.S. enterprise that are financial services providers or intermediaries exceed \$3,000,000. The voluntary section is **requested** to be completed if total purchases from unaffiliated foreign persons of all types of financial services combined by all subsidiaries and parts of the consolidated U.S. enterprise that are financial services providers or intermediaries are \$3,000,000 or less.

Enter the number associated with the type of financial service, instead of the complete title of the service, in the column heading of Schedule B. See V. of the **Instruction Booklet** for complete descriptions of the types of financial services covered.

Enter the names of countries not on the preprinted list, as appropriate, in the left hand margin of Schedule B. Report transactions with international organizations; identify these transactions as being with "Int'l Org." *Use additional copied sheets to list additional countries, as necessary.*

	ינאסי בלוטי כלווי בעוד
Service number	sical suformate yservice for
1	Brokerage services, including foreign exchange brokerage services
2	Underwriting and private placement services
3	Financial management services
4	Credit-related services, except credit card services
5	Credit card services
6 N	Financial advisory and custody services
7	Securities lending services
8	Electronic funds transfer services
9	Other financial services
	• If you use this service number — Enter on the schedule the total amount of fees you paid for all other financial services combined. See V. of the Instruction Booklet for examples of types of financial services to report under this service number.
	• If you reported data in the mandatory section of Schedule B under this service number — Enter a brief description of the primary type(s) of service(s) purchased.
	4

Par		OULE	B — P	ayn	nents of Fees an	nd Commissions	s to Unaffiliated	l Foreign	B1		
			<u></u>	Persons for Financial Services REPORT IN THOUSANDS OF U.S. DOLLARS							
			DE/								
	BEA USE ONLY		Service number:	Service number:	Service number:	Service number:	Service number:				
			(1)	(2)	(3)	(4)	(5)	(6)	(7)		
MA	NDATORY		1	2	3	4	5	6	7		
Complete if total payments of fees and commissions by the consolidated U.S. enterprise exceed \$3,000,000. Also complete question 21, as appropriate.		1	2	3	arm is n	poses of	w.	ndents.			
1.	All countries, total	001			ay 1	-n P	5 21	27			
	Belgium	002	¹ 302	2	3	40	5	6	7		
	Canada	003	¹ 100		3	4	5	6	7		
4.	France	004	¹ 307	2	3	4	5	6	7		
5.	Germany	005	¹ 308	2	3	4	5	6	7		
6.	Hong Kong	006	¹ 611	2	3	4	5	6	7		
	Italy	007	¹ 314	2	3	4	5	6	7		
8.	Japan	008	1 614	2	36, 60	4	5	6	7		
9.	Netherlands	009	¹ 319	2	3	4	5	6	7		
10.	Singapore	010	¹ 625	2	3	4	5	6	7		
11.	United Kingdom	011	¹ 327	2	3	4	5	6	7		
	Other — Specify (Use additional copied sheets as necessary.)		1071	2	3	4	5	6	7		
12.	he	012									
13.		013	1	2	3	4	5	6	7		
14.	- N	014	1	2	3	4	5	6	7		
15.	W.	015	1	2	3	4	5	6	7		
16.		016	1	2	3	4	5	6	7		
17.		017	1	2	3	4	5	6	7		
18.		018	1	2	3	4	5	6	7		
19.		019	1	2	3	4	5	6	7		
VOLUNTARY Complete if total payments of fees and commissions by the consolidated U.S. enterprise are \$3,000,000 or less.			NO 1	TE -	— If total payment complete the M	ts for all financial ANDATORY sec	services combine tion above, and li	d exceed \$3 millione 20 must be left	on – You must blank.		
20.	All countries, total	020	709				-				
	• If you unde ANDATORY • If you unde unde	ı are r serv ı are r serv	subject /ice nur subject	to t nbe to t nbe	he survey's mand r 1 — Complete it he survey's mand r 9 — Describe th n.	<i>tem 21.</i> datory reporting r	equirement and	you entered data	d		

	If you reported data in the mandatory section of Schedule B under service number 1, brokerage services — Enter the approximate amount of the total for all countries combined that was for transactions in each of the following groups of financial products. (Estimates may be based upon the judgment of knowledgeable persons, without conducting a detailed records search.)					
	 a. Long-term securities (stocks and bonds, including collateralized mortgage obligations, with no original maturity or with original maturity of more than 1 year) 	021	1			
b	b. Long-term and short-term derivative products (i.e., options, futures, swaps, forwards, and		1			
	warrants)	022				
			1			
	c. Other (such as commercial paper, bankers acceptances, and foreign exchange brokerage)	023				