6&+22/ 1'0 $66(' 8&$7,21 (3$570(17

, 7 DXGLWRI H6LKX P DLQWHQDQFH E\ 2GLKD 3UP DU\ (GXFDWRQ 3URJUDP HS XWKRULW\ 2 3(3$

+LJKOLJKW

7KH GHSDUWPHQW (3,6 DQG * ,6 ZDVRXWDGHGXDWHUHXLUHPHQWV DQDOVLVOHGLWRIWGLVFRQWLQXDQFHDQGQRXVH

^3DUDJUDSK

$ QQXDOXSGDWRQRI FKLOGUHRGV LQ&7 6 GDWDEDVHE\ XQDXWKRUL]HG EDFNHQG XHU DQG E\ SDWLQJ WKH OLG GRZQ SURFHGXUH OLG WR XQHDEOHDWRI GDWDIRUSDQQLQJ SXUSRVHV

^3DUDJUDSK

, QWRGXFWRQ

2GLKD3UP DU\ (GXFDWRQ3URJUDP HS XWKRUW2 3(3$ LXQFWRQLQJ XQGHUWKH 6FKRRODQG 0 DW (GXFDWRQ ' HSDUWPHQW60 (' LV WKH 6WDWH, P SOHP HQWLQJ 6RFLHW 6,6 IRUYHLHQJ WKH VXFFHVVXO IP SOHPHQWDWRQ RI 6DLYD 6KLNVKD $ EKLDQ 66$ DQDWRQDOOLDJ VKLS SURJUP HLQWKH6WDWH WRBEHMHVWKHJRDOVRI 8QLYHUVDO(OHP HQWDU\ (GXFDWRQ 8 ((RU IP SOHP HQWDWRQ RI SURJUP HP YDUIRXV GDWZHHWRE EFRQHFWHG FRP SXWLQJ GDQG SURJUHVP RQLWRULQJ

2 3(3$ IP SOHP HQWG,7 V\VWP RI H6LKX 3URMFWRQWLWRI VXE V\VWP V*YJ &KLOG7UFNLQ 6\VWP V &76 * HRJUDSKLFDO, QIRUP DWRQ6\VWP * ,6 DQG (GXFDWRQ3HUVRQQHO, QIRUP DWRQ6\WP (3,6 GXULQJ WRWDFN HDFK FKLOG P IQP LVHEDP IQDWLGXSOFDWDQG IDNHHQURP HQWIRUP XDWRQ SOQVIRU IXWXUHHQWDQW WRWKHHGXFDWRQ V\WP ZDKIQIUDWXFWXUHGHYHOPHQWRI HDFK FKLOGEDVHGRQKLVKHUFKLHYP HQWWRHQVXUHTXDOWHGXFDWRQ

1 HHGIRUFRQGXFWQJ IRORZ XS \$XGLW

,P SOHP HQWDWRQRI ,7 V\VWP RI H6LKX 3URMFWRI2 3(3$ ZDVDXGLWG IRUWKH SHURG DQG P HQWRQZDVP DGHIQ3DUDJUDSK RI &\$ * ∂ VBSRUW&LYLO IRUWKH\HDUHQGHG0 DUFK RQ* RYHQP HQWRI 2GLKDWKDW&76 IDLOHGGXHWR GHHFWVYHVRIWZDUHDQGDEVHQFHRI VXSHUYLVRQDQG P RQLWRUQJ IQIP SOHP HQWDWRQ RI SURMFWDQG(3,6 DQG * ,6 UHP DLQHGIQFRP SOHWHGXFWSDQQLQJ

7KLV\$XGLWIQWKHQDWXUHRI IRORZ XS ZDVFRQGXFWHGZKWKHREMFWVYHWRDWWHV ZKHWKHU UHFRP P HQGDWRQV IQ HDUOHU \$XGLW5HSRUW RQ GHYHORSP HQW DQG P DLQWHQDQFH RI ,7 V\VWP V(3,6 * ,6 DQG &76 IQFXGLQJ IQIRUP DWRQ VHFXUW ZHUHDGRSWHGDGHTXDWO DQGEHTHFWYH) GXULQJ WKHHQVXUHDFKHYP HQWRI XQLYHUVDOHOP HQWV HGXFDWRQXQGHU66\$ \$XGLWZ DVFRQGXFWHGLWKWWWFKFN

RI UHFRUGV RI 2 3(3$ HJKW LWWFW3URMFW&RRUGLQDWRUV ' 3&V HJKW%ORFN (GXFDWRQ2 IILFHUV %(2 V %ORFN 5HVRXUFH &HQWHU &RRUGLQDWRUV %5 &&V DQG 6FKRROVFRYHULQJ WKHSHULRGIURP 7KHILQDOUHSRUWDXWKHQWLFDWHG UHFRUGRIWRWDOLQFRPHRI ,7 V VWXGHQWV ZHUHDQDO\VHGXVLQJ VWXFWXUHG TXHU ODQJXDJH 64 / QWHJUDWHGZLWK &RP P LWWRHUFXP 6HFUHWDU\ RI WKH' HSDUWPHQW KRWLVDOR WKH 6WDWH3URMFW ILFHURI 2 3(3$ IQ $ XJXVW DQG UHPSRQVH RI WKH ' HSDUWPHQWZHUHFRQVLGHUHG DQG VXEVHO IQFRUSRUDWHG IQ WKH5HSRUW $ XGLW WDFNHGWKHGHYHORSP HQWRQIROORZ IQ UHFRP P HQGDWRQV

* $GGKRF DSSURDFK IQ WKH SODQQIQJ RI FRP SXWHUL]DWRQ HIRUWV KRXOG EH DYRLGHG
* 8QTXH&KLOG,' VKRXOGEHDOORWWGIRUHDFKFKLOGIRUWKHUIGHQWLFDWRQ
* ,QSXWDQGYDOLGDWRQFRQWROVKRXOGEHEXLOWQWRHQVXUHFRP SOHWHQHVDQG FRUUHFWQHVVRI WKHGDWD
* ,QLWLDWHVKRXOGEHWDNHQDGLVWFWDFWLRUSURP SWSHURGF DQGUHJXODU XSGDWRQRI GDWEDVH

$ XGLWILQGLQJV

,P SOHP HQWDWRQRI (3,6 6 ,6 VXEV WWP V

' HSDUWPHQW&RP P HQGDWRQ P DGHIQ WKHDUHDUHV $ XGLW5 HSRUWZDGKRF DSSURDFK IQ SODQQIQJ RI FRP SXWHUL]DWRQ FRQWUROV GHVFULEHG ZKHFK UHVXOWHG QQ IDLOXUH DQG GLVFRQWQXDQFH RI ZHE EDVHG (3,6 DQG GHYHORSP HQWRI IQFRP SOHWH DQG XQHDEOH* ,6

' XULQJ 2 3(3$ UHGHMJQHG DQHDUDSSURDFK *LH' LWWFW,QVSHFWRUV RI 6FKRROV RI WZDUH' ,66 WR DZHB EDVHG FHQWDODVHG (3,6 VRI WZDUH WR DGGUHVV GHIFIHQFIHVIQ WKH' ,66 DQG DGGLWRQDOIXQFWRQDOUHTXLUHP HQWRI ' LWWFW3URMFW 2 IILFHV' 32 V 2 3(3$ DQG WKH' ILHFWRUDWH RI (OHP HQWDU (GXFDWRQ' ((IRU P RQLWRUQJ DQG VXSHUYLVRQ DW HDFK VXFK OHYHV %HMGHV 2 3(3$ SODQQHG IP SOHP HQWDWRQ RI D* 36 EDVHG * ,6 VRI WZDUH IRU P DSSIQJ RI DOO HGXFDWRQDO IQWWXWRQV RI WKH 6WDWH DQG FUHDWRQ RI IQIUDWXFWXUHGDWEDVH WR EH XVHG DV GHFLVRQ VXSSRUW WWP WRROIRUWRS P DQJHP HQWQHQXUQJ TXDOW HGXFDWRQ

,P SOHP HQWDWRQ RI (3,6

2 3(3$ IP SOHP HQWG (3,6 IQ ZKWKREMFWYHV RI FRP SXWHUL]DWRQ RI SHUVRQQHO IQRP DWRQ SHQRQ DQG JUDWLW SD\ URO WHDVXU WDQF6WDWH DQG 6KLNWKD6DKD DNV 66 V XQGHU ((DQG 2 3(3$ 7KHGDWEDVHITURP HDFK' LWWFW,QVPHFWRU ,RI 6FKRROV DQG % 2 ZDV WR EHFXP XODWG DWUHPSHFWYH' 32 WKURXJK &' V 9' V ZKFK

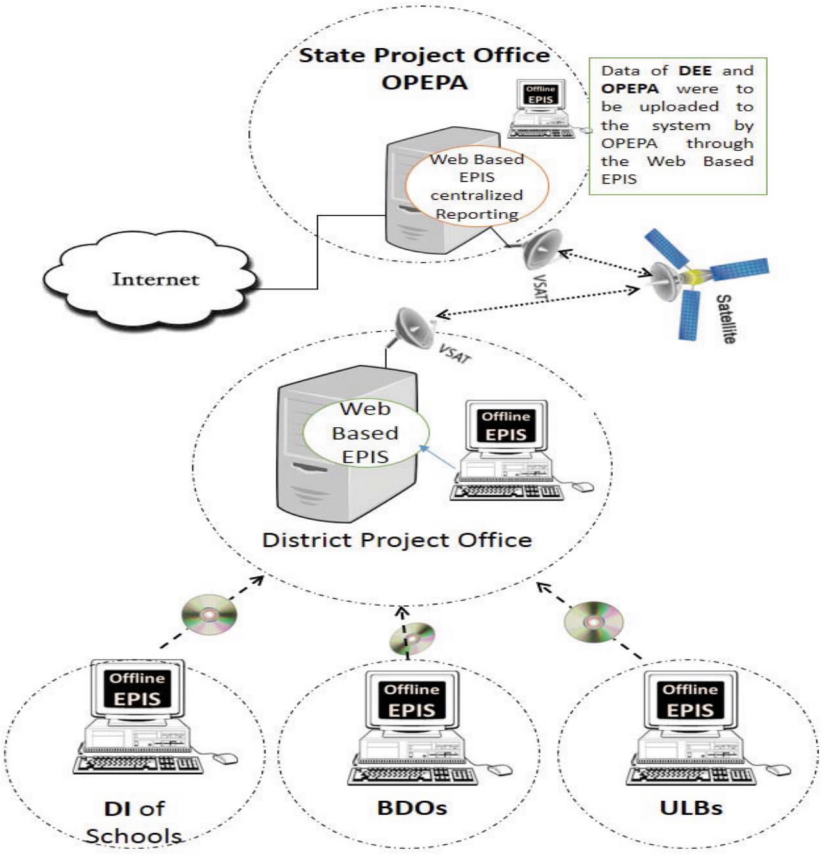
ZRXOG EH IXUWKHU QHFHVVDU\ WR 6WDWH VHOHFW DW2 3(3$ WKURXJK 9 6$ 7 FRQGFWLW IRUQ QDQHFHQWDOLVHG RQOLQH UHSRUWLQJ

,' &2 / 6RIWZDUH/ IP LWG ,6/ D* RYHQP HQWDJHQF\ ZDVDWLJHG - XO WKHUHVSRQVLELOLW IRUVXFFHVVIXOP SOP HQWDWRQRI(3,6 DWSURMFWRRWC ODNK ZLWKWHVWSXDWRQIRUFRP SOHWRQZLWKLQ[P RQWKV

3URMHFW RYHUQDQFH

\$ VSHUHWDEOVKHG EHWSUDFWHV IRU IP SOP HQWDWRQ DQ ,7 SURMFWWKDW DGGUHVVFRUH EXVQHVVSURFHVVRI DQ HQWWKHUHXKROGEHDQ ,7 WHUQJ FRP P LWHZLWKUHSUHQWDWRQRI WRS WDNHKROGHUVWRRYHUHWRYHUDOOGLUHFWRQ

Diagram depicting the data synchronisation process (executed every month) in Web Based EPIS for centralised reporting system



\$ YHUVP DOO DSHUWHWMP IQDO 9 6\$ 7 XVHG IQ ZIGHDUHDQHZRUN DVD FRP P XQLFDWRQ P HGLXP

&XVWRP LVDWRQ RI H[LWWQJ VRIWZDUHC ODNK HYHORSP HQWRI ZHEEDVHGDSSOFDWRQ DQG IQWUDWRQ ZLWH[LWWQJ 2 3(3$ SRUWOC ODNK, P SOP HQWDWRQ 1RUIQGLYGXDOVWWC ODNK %DFNRJGDWHQWC ODNK 6NLOGP DQSRZHUDW , 2 IIFHVC ODNK DQGP DQWQDQFHIRUQH\HDUC ODNK

RI WKH ,7 ILUWDWWHV &ODXVH RI WKH 0 HP RUDQGXP RI $ VRFLDWLRQ RI 2 3(3$ DOR VWSXODWHG WKDW6 WDWH3 URMHFW ILFHUU63' VKDOOFRQWLQXH6 WHULQJ * URXS IRUGHYHORSP HQWDQG IP SOHP HQWDWLRQ RI WKHSURMHFW

$ XGLWRUWFHG WKDW63' GLG QRWIRUP D6 WHULQJ * URXS SURUWR WKHGHYHORSP HQW DQG IP SOHP HQWDWLRQ RI (3,6 IQ ' XULQJ IP SOHP HQWDWLRQ RI (3,6 ZKHQ SUREOHP VQONHHURUVIQ WKH VRIWZDUH QRQIQWDWLRQ RI (3,6 IQ GLIIHUHQWIHG RIIFHV HWZ FHUWFHG D6 WHULQJ &RP P LWWH ZDV IRUP HG IQ 1 RYHP EHU 7KLV FRP P LWWH P HWRQ) RQFH DQG ZDV FKDLUHG E\ ' HSXW * HQHUDO 0 DQDJHU * 0 6\ WMP VRI ,' &2 / 6RIWZDUH/ IP LWG ,6/ WKHYHQGRUIRUWKH SURMHFWWQWDG RI EHQJ FKDLUHG E\ DGP IQLWWDWYHDXWRUW IURP 2 3(3$ 7KH ORZ OHYHO RI IQYROYHP HQWRI 2 3(3$ P DQDJHP HQWIQ SURMHFWIP SOHP HQWDWRQ FHDLQ IQGLFDWG ODFN RI SURMHFWWZ QHUWKIS E\ WKH HQWW UHGHUQJ WKH SURMHFW GHYHORSP HQWGLUHFWRQHV

' XULQJ GLVFXVVRQ $ XJXVW &RP P LWWRQHUFXP 6HFUHWDU\ DJUHG WKDWKHDG RI DGP IQLWWDWYH HQWW VKRXOG KDG WKH FRP P LWWH WR P RQLWRUWKH GHYHORSP HQW DQG IP SOHP HQWDWRQ RI (3,6 ZKIFKZ RXOGEHWWNHQ IQRDFFRXQWQIXWUH

, QDGHTXDWH IXQLHP HQWDQDOVLV

$ VRIWZDUHQDP HG µ%(7$ 1 ∂ ZDVIQ XVHIURP IQ %ORFNVRI WKH6 WDWH IRUJHQHUDWRQ RI SD EHOOVRI WKH HP SOR\HHVDQG WDFKHV 7KH6 WDWH* RYHQP HQW IQ * HQHUDO$ GP IQLWWDWRQ * $ ' HSDUW HQWKDG DOR IQLWDWG WKH SURFHVV RI GHYHORSP HQW0 D\ RI + XP DQ5 HVRXUFH0 DQDJHP HQW6 \ WMP + 506 ZDW WKHREMFWVYH WRHQDEOHDOOHMEOVKP HQWRI DOOGHSDUW HQWWRFDUU RXWPHURQQHO P DQDJHP HQWWDOVFWRQVONHUFUXLW HQWSURP RWRQVWDQVHUVONHDYH WDIQIQV GHSXWDWRQV FRXUWFDHV SHQRQ SD\ROOSURFHVVQJ HW WKURXJK DZHEDVHG VVWMP

: DWRXWFRQVGHUQJ WKHXVEIODWV RI + 506 DQG %(7$ 1 WKH2 3(3$ DZ DGHG -XO WKHZ RUN RI GHYHORSP HQWRI \HWDQRWKHUVMP IODU RI WZDUH(3,6 WR DGGUHVVMP IODU+ 5 IXQFWRQDOWHVONHSD URO SHQRQ FRXUWDHV 7KH REMFWVYH RI (3,6 DOR IQFOXGG WKFNQJ RI VFKRROGHYLDQFIHV WFKHUDWRQDOVWRQ DQG P DQDJHP HQWRI WDQVFWRQV DQG SRWQJ V 7KH (3,6 DIP HG WR FRYHU ORFDWRQZ KIFKIQFOXGG EORFNVE\ UHGHMJQIQJ HDUDHUEDQRQG' ,66

: HQRWHG WKDWGXUQJ IP SOHP HQWDWRQ WWJHV WKHUHZ DVIQDGHTXDWIQYROYHP HQWRU GIUHFWRQ E\ 2 3(3$ P DQDJHP HQW\$ VDUHVXOWRXWRI WKH WWJHWG ORFDWRQV (3,6 FRXG QRWEH IP SOHP HQWG IQ EORFNVDV %(7$ 1 ZDV VXFFHHVVIXO0

$ WLWWQW IUFWRU0 ,6 2 3(3$ 3URJUDP P HU632 3URJUDP P HU $ QIXO' LWWFW\QSHFWRU RI 6FKRROV KRUGKD' DW(QW 2 SHDWRU. 1 DJDU(VWEOVKP HQW2 IIFHU' ((DQG 0 DQDJHU([HFXWYH 740

$ VRIWZDUH GHYHORSHG E\ 2 GLVKD &RP SXWU\ $ SSOFDWRQ &HQWH UHDWQJ SD\URO P DQDJHP HQW VWP RI 3DQFKD DW5 DV HSDUW HQW* RYHQP HQWRI 2 GLVKD

' ,V %ORFNV 8 / %V 32 V ((DQG632

UXQQLQJ WKHUHDQG2 3(3$ KDG WR UHGXFH 1 RYHP EHU WKHFRYHUDJ HIURP WR ORFDWRQVH[FOXGLQJ ORFDWRQV EORFNVDQG 8 / %V

&KHFNRI UHFRUGVRI VDP SOHG GLVWUFWUHYHDOHG WKDWDOO 32 VZ HUHQRWXVLQJ (3,6 7KH 32 VZ HUH P DLQO UXQQLQJ Z LWK FRQWDFWXDO HP SOR\ HHV DQG WKHLU SD\ UROO UHFRUGVZ HUHEHLQJ J HQHUDWG DQG P DLQWDLQHG WKURXJ K ([FHO VKHHW $ IWU XVLQJ (3,6 XS WR 0 DUFK , RI VFKRROVDOVR GLVFRQWQXHG WKHVDP HDQG DGRSWG WKH +5 0 6 Z KIFK Z DV P DGH P DQGDWRU IRU DOO 2 V IURP $ SULO 7 KLV DOVR LQGLFDWG LQDGHTXDW UHTXLUHP HQWDQDO VLV EHRUH WDNLQJ XS WKH SURMFWZ KIFK UHVXOWG LQ UHGXFWRQ RI VFRSHP LGZ D\ GXULQJ IP SOHP HQWDWRQ DQG GLVFRQWQXDQFH RI (3,6 LQ 32 VDQG , V

' XULQJ GLVFXVVLRQ $ XJ XVW &RP P LVVLRQHUFXP 6HFUHWDU DGPLWWG ODSVHRI SODQQLQJ RQ WKH SDUWRI 2 3(3$ DQG WDWWG $ XJ XVW WKDW(3,6 Z DV EHLQJ XVHG LQ 6 WDW 3 URMFW2 IIIFH 632 DQG ((%XWWKH IDFWUHP DLQHG WKDWWKH EDVIF REMFWYH RI (3,6 *YLJ* WDFNLQJ RI VFKRROOHYHO YDFDQFIHV FRXUWFDVHV WDFKHU UDWRQDOVDWRQ WDQVHUDQG SRWLQJ FRXOG QRWEHP HW

3 URMFWP RQLWRULQJ 3 D\ P HQWWR YHQGRU Z LWKRXWGHYHORSP HQWRI IRQWDFWG P RGXOH

: HE EDVHG(3,6 Z DV WR VHUYHDVDQ HIIHFWYHRQOQH+ XP DQ 5 HVRXUFH,QIRUP DWRQ 6\ VWP +5,6 IRU FHQWDOVHG P RQLWRULQJ DQG UHSRUWQJ WRRO IRU WKH GHFLVRQ VXSSRUWV VWP LQ WDFNLQJ YDFDQFIHV DQG FDSDFLW P DSSLQJ DWYDUIRXV ORFDWRQV 2 QH RI WKH REMFWYHV RI (3,6 Z DV WR KHOS LQ WDQVHU DQG GHSXWDWRQ UHDWG GHFLVRQV

: HQRWFHG WKDWGDWZ DV WDQVP LWWG LQ&' VE\ WKH' LVWUFWWR2 3(3$ LQWWDG RI V\ QFKURQLVDWRQ WKURXJ K WKH Z HE DSSOFDWRQ 7 R DQ DXGLWTXHU WR IXUQLVK WKH Z HE DSSOFDWRQ RI (3,6 IRU YHUIIFDWRQ 2 3(3$ SURGXFHG D' 9 ' FRQWDLQLQJ VRP H UHSRUWILOHV DQG GDWD SHUWLQLQJ WR . KRUGKD' LVWUFWZ KIFK GLG QRWFRQWDLQ WKH LQWQGHG Z HE DSSOFDWRQ DV HQYLVDJ HG LQ WKH SURMFWSURSRVDO 7 KLV LQGLFDWG WKDWWKHP RGXOH Z DV QRWGHYHORSHG

%XW2 3(3$ SDLG $ XJ XVW ±0 D\ C ODNK Z KIFK LQFOXGHG Z HE EDVHG DSSOFDWRQ FRWWRUC ODNK Z LWKRXWYHUI\ LQJ WKH GHOYHUDEOHV

7 KXV GXH WR QRQ GHYHORSP HQWRI WKH Z HE P RGXOH 2 3(3$ FRXOG QRWDFKIHYH WKH HQYLVDJ HG REMFWYHV RI (3,6 *LH* VXSHUYLVRQ DQG P RQLWRULQJ WKURXJ K FHQWDOVHG UHSRUWQJ V\ VWP IRU GHFLVRQ VXSSRUW

' XULQJ GLVFXVVLRQ &RP P LVVLRQHUFXP 6HFUHWDU WDWWG WKDW2 3(3$ VKRXOG VKDUH HYLGHQFHRI H[LVWQFHRI P RGXOHWR $ XGLWLI DYDLODEOH+ RZ HYHU WKH VDP HZ DV QRW VKRZ QWR $ XGLW 6HSWP EHU

7 KXV GXH WR SRRU SURMFWSODQQLQJ RZ QHUVKLS DQG P RQLWRULQJ RI 2 3(3$ Z HE EDVHG (3,6 VRI WZ DUH FRXOG QRW EH GHYHORSHG DQG IP SOHP HQWDWRQ RI WKH FXWWRP LVHG YHUVRQ RI (3,6 IDLOHG LQ VSLWRI H[SHQGLWXUHRI C ODNK

, P SOHP HQWDWLRQ RI * HRJUDSKLFDO, QIRUP DWLRQ 6\ VWHP * , 6

2 3(3$ GHFLGHG WR GHYHORS DVWDWH* OREDO3RVLWLRQLQJ6\VWHP *36 EDVHG * HRJUDSKLFDO, QIRUP DWLRQ6\VWHP *, 6 VRIWZDUHZDV DOORFDWHG LQ DOOKHHGXFDWLRQDO IQIUDVWUXFWXUHGHMDOVZLWKSKRWRJUDSKVWRDFWVDGHFLVRQVXSSRUWV WHRSWLRQ WKHVRS P DQDJHP HQWRI 2 3(3$ IRUVSHG\ DQGDFFXUDWHGHFLVRQ SURYLGLQJ IQIUDWUXFWXUHLH VFKRROVEXLOGLQJVWRDGMXVWHVWLPDWHV WR HQVXUHTXDOLW\HGXFDWLRQ" HSLWHVSHQGLQJ C FURHRQWKHSURMHFW2 3(3$ IDLOHGWRDFKLHYHWKHREMHFWLYHVIRUHDRQVGHMDOHGXQGHU

' DWDTXDOLW\

$ NH\ HOHP HQWRI WKH SURMHFWZDV WR FUHDWH DGDWDEDVH KDYLQJ ORFDWRQDO IQIRUP DWRQDQGDYDLODEOHP HQWHVIQ VFKRROVIQ2 GLVKD7KHZRUN ZDVDZDUGHG WR2 &&/ WKHYHQGRUIQ$ SULO WR FUHDWHWKHIQIUDWUXFWXUHGDWDEDVHZLWKIQ WKUHHP RQWKV2 &&/ VXEP LWWGLWQ' HFHP EHU WR2 3(3$ 6HYHUDOHHURUVIQ WKHGDWDEDVHUHFRUGVIRXQG E\ 63' 2 3(3$ 2 &&/ UHVXEP LWWGWKHGDWD0 DUFK EXWZDVP LQDUHURUV7KHHQWHGDWRQ* ,6 VXEP LWWGE\ 2 &&/ ZDVWREHVFUXWLQL]HGDQGSD P HQWZDVWREHUHDDGWKH TXDOLW\RI ZRUNGRHE\ $ SURMHFWHYDOXDWRQFRP P LWWHHYDOXDWHGWKH FRQP LWWHRQ) YHULFLHGWKHVRWO QXP EHURI VFKRROVYJVj YJV7KHDFWXDOQXP EHURI VFKRROVXSLYH HGDJDQWZKLFK ERWKSKRWRJUDSKVDVZHOODV* 36 UHDGLQJ VZHUHSUHP HQWZDWRXWH[P IQIQ RWKHU HURUV7KHIIQDOSD P HQWZDVUHDDGE\ $ SURJ VRWKHYHQGRUEDGRQWKH YHULFLFDWRQ SRWXEP LWWGE\ WKHFRP P LWWH7KHFRP P LWWHKRZHYHU OHIWD JDS IQ HQVXUQJ WKHTXDOLW\RI GDWDDVVXEP LWWGE\ 2 &&/ GXULQJ IIQDO YHULFDWRQ

$ QDO VLVRI GDWDE\ $ XGLWSHUMQIQ WR SKDVH, ZRUN UHYHDOHGWKHIROORZ IQ HURUV

* 2 XWRI UHFRGVRI VFKRROVFUDWFDOHURVQHVFKRROVKDYIQ GXSOFDWH ORQJLWXGH DQGODWXGH P IWIQ SKRWRJUDSKV GXSOFDWH SKRWRJUDSKV HWZHUHQRWFHGIQ VFKRROV SHUFHQW6XFKNIQGRI HURUVZRXOGHDG WR P LVOHDGIQJ IQIRUP DWRQ WKHWRS P DQDJHP HQWIQ WKIQJ GHFLVRQ SURYLVRQRI QHZ VFKRROVIQIUDWUXFWXUHIDFLOLWHVWRWKHUHTXHG VFKRROV$ V DQIQWMQFH RP HRI WKHHURUVDUHIIQGXWMDWGE\ORZ

, QXWMDWRQ ' IIHUHQWSFKRROVKDYIQ GHORQJIWXGHDQGODWXGH

1 DP HRI WKH' DWDFW	6FKRROI DP H	/ DWXGH	/ RQJIWXGH
* DQMP	. RIQSKXOD3 6		
* DQMP	. XWP EDUL3 6		
* DQMP	6IDOMQJL3 6		
* DQMP	7 DEXGLD3 6		

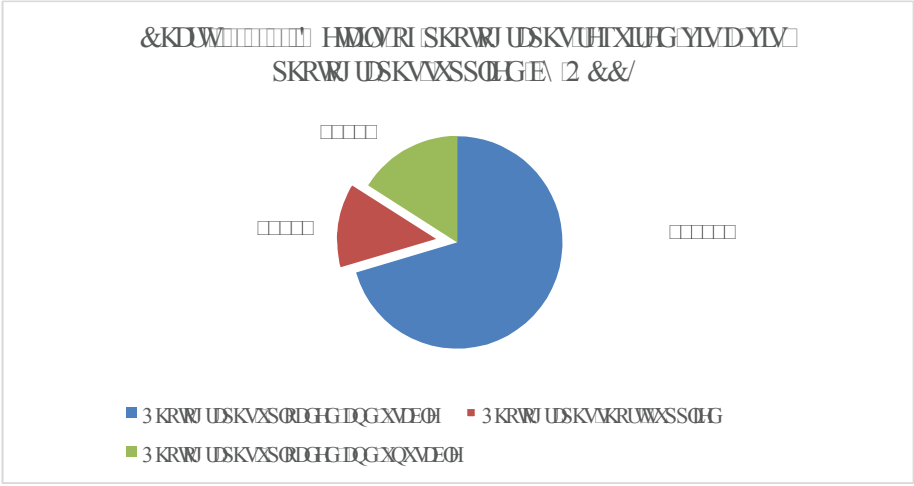
,QGXVWULDORQ6FKRROVKDYLQJ3XEOLF6FKRROV

1DPHRI6WDWH'LVWULFW	6FKRRO1DPH	3KRWRJUDSK	0DLQ3KRWRJUDSK	0DLQ3KRWRJUDSK
$QJXO	6DUDZDW6KLVKX0DQGLU	,0*B	1XOO	1XOO
$QJXO	'$9 3XEOF6FKRRO	,0*B	1XOO	1XOO
$QJXO	1LJDPDQGD,QWHUQDWLRQDO6FKRRO	,0*B	1XOO	1XOO

,QGXVWULDORQ6FKRROVZKHHWKHSKRWRJUDSKVZHUHGXSOLFDWHGDFURVV6FKRROV

1DPHRI6WDWH'LVWULFW	6FKRRO1DPH	3KRWRJUDSK	3KRWRJUDSK	3KRWRJUDSK
$QJXO	'DDEHKHDVKL66	3,0*B	3,0*B	3,0*B
$QJXO	%UXW36	3,0*B	3,0*B	3,0*B
$QJXO	7HQWKRL66	,0*B	,0*B	,0*B
$QJXO	1XDVDKL36	,0*B	,0*B	,0*B

*2&&/KDGWRVXSSOUHSKRWRJUDSKVIURPHDFKVFKRROI7KLVPHDQWVXEPLWWRQRI SKRWRJUDSKV IQUHVSHFWRI VFKRROVDFURVV2GLVKD%XWDXGLWRUWGVKDWRQO\ *SHUFHQWSKRWRJUDSKVZHUHXSORDGHG



7KLVUHVXOWHGLQ VKRUWXSSOI RI SHUFHQWSKRWRJUDSKVE\ 2&&/ 7KH DEVHQFHRI SKRWRJUDSKVZRXOGOHDGWRQRQLGHQWLFDWLRQRI WKHVFKRROGDGWKH DFWXDOFRQGLWLRQRI WKHVFKRROEXLOGLQJ URRP VWRLOHWVDQGLWVXUURXQGLQJV IRU IXUWKHUSURYLVLRQRI DP HQLWLHV

*7KH VFKRO SKRWRJUDSKV ZHUH VDYHG LQ WKH GLVNV IQ IRQH DV FRUHSSRQGLQJ EORFN FRGH 7KHQDP HVRI WKH ILOHVWRUHG LQ WKH GDWDEDVH IHOG 7KURXJK WKLV QQN ZH ILOHQDP HRI WKH IP DJH WKH VWMP FRXQG UHWULYHWKH IP DJHRI WKH VFKRO EHQRWHG WKDWKHZHUHXQDEOH WROLQNDQ\ RI WKH GDWDEDVH ILOHQDP HVIQ WKHGDWDEDVHZKIFKZRXOGQRWHHWKH QQNHG IP DJH ILOHQDP HV

WKHUHE\ RQO SKRWRJUDSKVZHUHWDJHGWRVFKRROVUHQGHULQJ SKRWRJUDSKVZLWKRXWXVH

7KXVWKHGHYHORSPHQWRIHURUSURQHDQGIFRP SOHWH* ,6 VRIWZDUHZKFKFRXOG QRWEHSXWWRXVHIRUSODQQLQJ DQGGHFLVLRQSXUSRVHVEHFDXVHRIWKHXQUHDOLDEOH RI WKHGDWDUHQGHUHGE\ SHQGLQJUHRI C FURUHIQUXFWXRXV

' XULQJ GLVFXVVLRQ $ XJXVW &RPP LWWHRHUFXP 6HFUHWDU\ WDWHG WKDWWKH SDPHQWZDVUHDHGWR 2 3(3$ RQ WKHEDVLV RI UHFRP PHQGDWRQV RI WHFKQFDO FRP PLWWHH

%XW FRP PLWWH KDG UHSUHPHQWDWRQ IRP 2 3(3$ DQG LW VKRXG KDYH UHFRP PHQGHG IRUUHDHDVHRI SDPHQWV WUDGLWLRQFFXUDF\ DQGFRP SOHWHVV RI WKHGHDYHUDEOHVPSURYLGHGE\ 2 &&/

5 HYLDORI SKDVH,, SURSRVDOGHSLWHUURQHRXVGDWDEDVH

,Q WKHFLUFXP VWQFHV RI SUREOP VRI GDWDUHDEOLW DQG XVDEIW RI * ,6 LWZDV GHFLGHG IQ QRWWRJR DKHDG ZLWK SKDVH, RI WKHSURMHFW+ RZHYHU RQ WKH EDVLV RI FRP PXQFDWRQ UHFHLYHG IURP 0 V* HR, QIRWFK/ IP LWHG ' HFHP EHU WKHHDGHUSURSRVDORI SKDVH,, ZRUNFRUGHYHORSP HQWRI ZHEEDVHG* ,6 V\ VWP ZDV DUEWDULO UHYLVHG -DQXDU 2 3(3$ HQJDJHG IQ IGHQW\ IQJ WKHDSSURPULDWHYHQGRUFRUGHMJ QIQJ ZHEEDVHG* ,6 WKH0 IQIVW RI + RXVQJ DQG8 UEDQ3RYHUW\ $GMLQLVWDWRQ* R, IGHQWLHG SURPULHWRUV ZKRGHDOW IQ* ,6 VRIWZDUH2 3(3$ KRZ HYHUDZ DGHGWKHZRUNRI SURMHFWPSOP HQWDWRQ WR* HR, QIRWFK IQ0 DUFK ZKFKZDVRQEHRI WKHYHQGRUVRI 2 &&/ GXUQJ SKDVH, ZRUN7KHZRUNZDVVSOWQWRIIYHZRUNV DQGIDZDGWR* HR, QIRWFK IRUC ODNKZDWRXWQYLWQJ RSHQWQGHUHWQGHUQ WKHJURQG RI VQJOH VRXUFHSURFXHP HQWDQGZDWRXW[SORUQJ SRWEELW RI RWKHUHQJLEOHYHQGRUV

7KH* ,6 DSSOFDWRQ ZDV WR EH GHYHORSHGZLWK[LWQJ GDWEDVHZLWK2 3(3$ GHYHORSHGE\ 2 &&/ GXUQJ SKDVH, ZRUN ZKFK FRQWQXHG IQ ODWXGH IQ UDWXFH SKRWRJUDSKV HWF WKH IRUHJRQJ SDUDUDSK* HR, QIRWFK ZDV WR FRP SOHWHWKHZRUNVZLWKLQ[P RQWKV IURP WKHGDWRI ZRUN RUGHU7KHDSSOFDWRQ VRI WZDUHRQ* ,6 ZDVIQWDOHGIQ WKH VHUYHUDW2 3(3$ DQG WWWHGIQ $ XJXVW 7KH SKDVH, ZRUN WDWHG WKDWWKH EHHQFRP SOHWHGE\ * HR, QIRWFK ZDV GHIFLHQWDV WKH ORFDWRQ DOGDWRI VFKRROV QOXGHG DWRI WKH GDWDXWH ZDVIQFRUUHFWDG WKHGHYHORSHGZHEEDVHG* ,6 V\ VWP ODFNHG SURYLVRQ RI KDEWDWRQ EDVHGDQDO VVZKFKZDVDEDVF UHIXUHP HQWRI * ,6 WR JHWWKH IQFRP DWRQ RQ KDEWDWRQVZKFKZDVQHGHG1RUSODQQLQJ IXUWKHU VFKRROQJ IDFLOWHV

' XULQJ GLVFXVVLRQ $ XJXVW &RPP LWWHRHUFXP 6HFUHWDU\ DVNHG2 3(3$ WR IXUQVK MXWWFDWRQ WKDWWKLVZHEEDVHG* ,6 VRIWZDUHDFTXLUHGE\ 2 3(3$ ZDV

$ UF* ,6 6HLVHUVWQGQG GLG GLVRQ C ODNK $ UF* ,6 $ UF(GLVRUC ODNK $ SSOFDWRQ GHYHORSP HQWZDWKGXDOOQ XDJHSRUWC ODNK DWP IJUDWRQ DQGIQWHOODWRQ WWWQJ HWC ODNK 3UQWQJ RI P DSVDQGSOFHP HQWRI WFKQFDOH[SHUWC ODNK

WKHRQO VRIWZDUHDYDLODEOHIQWKHP DUNHW2 3(3$ KRZHYHUFRXGQRWXQGHUVWDQG WXWLFDWRQDVRI 6HSWHPEHU

, P SOHPHQWDWRQRI &KDSWHU 7 UDFNLQJ 6\ WHP &7 6

$ GDWDEDVHRI DOOFKLOGUHQRI \HDUVZKWHUQDP HDJH VH[FDWHJRUDQDWLRQVIRUQRWDWQGIQJ VFKRRODQG RWKHUQGIFDWRUVZDVGHYHORSHGRQWKHEDVLVRI GDWDFROOHFWHGRQ2 UWRD &KLOG&HQVXV 7KLVGDWDEDVHZDVORDGHGIQWR6WDWHGDWDEDVHVHLYHUDQG GLWLFWHYHLV7KHREMHFWLYHVZDVWRGHYHORSDQRQOLQH&7 6ZKLFKWKHFXUHQW VWDWXVRI HFKLOGZRXOGEHDYDLODEOHIQWKHZHE7KH&7 6YDOLGDWRQDQG XSGDWQJ SURFHVZDVDGRSWGWRXSGDWHFKDQJHVRI WKHFDVHGXFDWRQSURJUHVV IQGLFDWRUV SHUFHQWJHRI P DUNVHFXUHG IQWKHDQQXDO H[P IQDWRQ VFKRROGURSRXWRI VFKRROVDQGQHZ DGP LVWRQVRI WKHFKLOGUHQIRUWKH\HDV DQG 7KHUHJWUDWRWKHUFKLOGXSXLY ZDVFRQGXFWGQ DQG WKHFKLOGGDWZDVXSGDWGIRUWKH\HDV DQG XSGDWQJ SURFHVZDVDGRSWGWRXSGDWHFKDQJHVRI WKHFDVHGXFDWRQSURJUHVV IQGLFDWRUV SHUFHQWJHRI P DUNVHFXUHG IQWKHDQQXDO H[P IQDWRQ VFKRROGURSRXWRI VFKRROVDQGQHZ DGP LVWRQVRI WKHFKLOGUHQIRUWKH\HDV DQG 7KHUHJWUDWRWKHUFKLOGXSXLY ZDVFRQGXFWGQ DQG WKHFKLOGGDWZDVXSGDWGIRUWKH\HDV DQG XSGDWQJ SURFHVZDVDGRSWGWRXSGDWHFKDQJHVRI WKHFDVHGXFDWRQSURJUHVV IQGLFDWRUV SHUFHQWJHRI P DUNVHFXUHG IQWKHDQQXDO H[P IQDWRQ VFKRROGURSRXWRI VFKRROVDQGQHZ DGP LVWRQVRI WKHFKLOGUHQIRUWKH\HDV

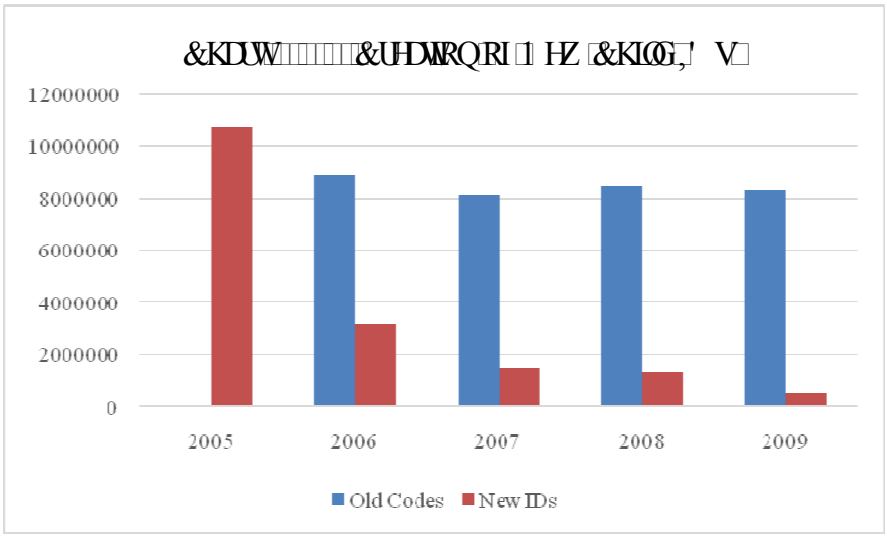
$ XGLWQRWHGWKHIROORZ IQJ GHILFLHQFLHV

1 RQ DOORP HQWRI 8 QLTXH&KLOG,'

' XHWRQRQ DOORP HQWRI 8 QLTXH&KLOG,' VRHDFKFKLOGIRUWKHUHJLVWHUHGQWLFDWRQ DVUHFRP P HQGHGIQHDUHUS XGLVS HSRUWVREMHFWVRI FRQWUROXRVVDFNLQJ RI HDFKFKLOGIRUHGXFDWRQDOODQGHFRQP LFVWDWXVFRXOGGQRWEHDFKLHVHG

2 3(3$ GHVYHORSHGDFKLOGGDWDEDVH &7 6 FRQWQLQJ FKLOGIQIRUP DWRQDNHFKLOG QP H JXDGLDQ YLOODJH VFKRROFODVV GDWRI ELUWK DQXDODWWQGDQFH P DUNV VHFXUHG HWV DI WUFRQGXFWQJ DGRRUVWRGRRUVXSYHV GXULQJ 8 QGHU&7 6 HDFKFKLOGZDVWREHSURYLGHZ DXQLTXHFKLOGFRGHWKDFNLVKHUHGXDWRQDO DQG VRFIRHFRQP IF VWDWXV7KHGDWDEDVHZDVXSGDWGHYHU \HDUXS WR XQWO IQWRGXFWRQ RI 5 LJKWWR(GXFDWRQ $FW 7UDFNLQJ WKHVWDWXV RI DFKLOGLV SRWLEOHIRQ WKURXJKDGRSWRQ RI XQLTXHFKLOG,' 2 3(3$ FOLP HGWKDWWKDG DGRSWG WKHUHFRP P HQGDWRQ P DGHIQ WKLV UHJDUG IQ WKH $ XGLW5 HSRUWRI &RP SWROOHUDQG$ XGLWRU* HQHUDORI ,QGLD

7KHFKLOGGDWEDVHZDVEXLOWGXULQJ DQG WKLVZDVJDQ YDOGDWGWKURXJK $ FFRUGIQJO FURUHFKLOG,' VZHUHDOORWWGWRDOOWKHFKLOGUHQRI WR \HDUV RI DJH,QVXEVHTXHQW HDUV &7 6XSGDWRQZDVGRQHIRUWKHFKLOGUHQRI WR \HDUVDJHJURXS+ HQFH GXULQJ WKH\HDUV WR WKHFKQFHVRI IGHQWLFDWRQRI QHZ FKLOGUHQZRXOGEHP HDJUHDQWWZKRP QHZ FKLOG,' VZHUH DOORWWGXULQJ %XWLWZDVREVHUYHGWKDW ODNKQHZ FKLOG,' VZHUH DOORWWGXULQJ 7KHUHZHUH FURUHFRGHVIQUHSHFWRI DOOGLVWEWRQGDOORWWG GXULQJ DVGHSLFWWGIQWKHFKDUWEHORZ



7 KHFUHDWRQRI QHZ ,' VZ DVVL] HDEOHIURP WR 7 KLVLVEHFDXVH IQWMDG RI XVLQJ XQLTXH ,' GXULQJ XSGDWRQ FKLOGUHQ WDQVHUUHG IURP RQH VFKRRO WR DQRWKHU Z HUH DOORWMG ,' V DIUHVK , Q WKLV SURFHVV WKH VDP H FKLOG Z DV DOORWMG GLIIHUHQW,' V IQ GLIIHUHQW \HDUV Z KHQ KH LV WDQVHUUHG WR QHZ VFKRRO' DWDEDVH DQDO VLVUHYHDOHG WKDWLQ WKH \HDU WKHQXP EHURI FKLOGUHRUGVZ DV ODNK RXWRI Z KLFK RQO ODNK FKLOGUHQ KDYH FRQVLVWQWFRGHIDFURVSUHYIRXV \HDUV 7 KHUHRUH WKH SHUIRUP DQFH WDFNLQJ DFURVV SUHYIRXV \HDUV Z DV QRWSRWLEOH DJ DLQVW ODNK FKLOGUHQ Z KLFK LV P RUH WKDQ *SHU FHQW* RI WKH FKLOG SRSXODWRQ

2 3(3$ GLG QRWXSGDWH WKH FKLOG GDWDEDVH GXULQJ GXH WR GHOD HG VRIWZ DUH P RGLIIFDWRQ SURFHVV IQ WKQH Z LWK 5 7($ FW , WFUHDWMG DQRWKHU VRIWZ DUH EDVHG RQ 5 7(UHTXLUHP HQWGXULQJ DWD FRVWRI C ODNK , Q WKH QHZ VRIWZ DUH QHZ IXQFWRQDODWHV IQ WKQH WR 5 7($ FW Z HUH DGGHG DQG WKH IXQFWRQDODWHV ODNH SURYLVRQ RI XQLTXH FKLOG ,' IQIRUP DWRQ RQ DSSHDUDQFH IQ DQQXDO H DP IQDWRQ P DUNV VHFXUHG HWF Z HUH UHP RYHG 7 KH FRGLQJ SDWMLQ IQ UHVSHFWRI YLOODJ HV VFKRRO VDQG FKLOGUHQ Z HUH FKDQJ HG DQG WKH QHZ GDWDEDVH ORVW WKH OQN WR WKH HDUOHUGDWDEDVHVRI WR

: H IXUWKHU QRWFHG WKDWGXH WR IP SURSHUUHDWRQDO IQWMJ ULW FRQWWDLQW IP SRVHG IQWR WKH GDWDEDVH GHMJ QV WKHUHZ HUH P XOWSOH FKLOG QDP HVP DSSHG WR VLQJ OH FKLOG ,' 7 KHUH Z HUH VXFK FDVHV IQ DQG FDVHV IQ GDWDEDVHV

7 KXV Z LWKRXWD XQLTXH FKLOG ,' 2 3(3$ IDLOHG WR WDFN HDFK FKLOG IRUHGXFDWRQDO VWDWXVRQ DQ DQQXDO EDVLV WKHUHE \ GHIHDWQJ WKH REMHFWYHRI IP SOHP HQWDWRQ RI WKH VRIWZ DUH ' HVSLWH WKH UHFRP P HQGDWRQV P DGH IQ WKH HDUOHU $ XGLW5 HSRUW VXFK LUUHJ XODULWHV QRWRQO SHUVLVWMG EXWWKH P DWMU Z DV QRWORRNHG IQWR Z KLOH P DNLQJ P RGLIIFDWRQ WR WKH &7 6 IQ

' XULQJ GLVFXVVLRQ $XGLW &RPPLWWHH PHPEHUV FRQILUPHG WKH SURSRVDO RI 2 3(3$ IRUP DSSLQJ WKHFKLOGGDWD RI DQG P DQXDOO WHFKQLTXHFKLOG,' KDVQRWEHHQ DGRSWHG VLQFH

HDVDSSOLFDWLRQ FRQWURO DIIHFWLQJ GDWDTXDOW

' HVLJQLFRP P HQGDWRQV P DGHLQHDUHU $XGLW5 HSRUWWRE XGLQGLQ YDOLGDWRQ FRQWURO WKHQVXUHFRP SOHWHDQG FRUUHFWQHVV RI GDWD WKHLUHJXODUWHV FRQWLQXHGXULQJ GXHWKZKFK GDWD LHP DQG XQHDEOHLQDFFXUDWH DQG LDOGYHU SXUSRVHRI WDFNLQJ EHFKFKLOG?

$ QDO VLVRI GDWEDVHUHYHDOHG WKDWWKHUHZ HUHLQFRQVLVWHQFLHVLQWKHGDWEDVHDV EHORZ

L **$ EVHQFHRI UDQJHFKHFNV** HIRXQG WKDWWKHUHZ DVQR DJHOLPLWDWRQ IQ WKH ILHOG FDSWXUQJ WKH GDWD*LH* WKH FODVV DWWQGHG E\ WKH FKLOG7 KLV UHVXOWG IQ HURQHRXV GDWD FDSWXUH DFURW WKH \HDUV FKFHNHG IQ $ XGLW 7 KHVHHUURUV ZHUHQRWG WR WKH HQWLWURP FDVHV RI VR FDVHV IQ

6IP ILDUYDOGDWRQ FRQWROVZHUHODFNLQJ IRUTIOOQJ FKLOGFDWRU 6&67 2%&2 WKHVRUP RWKHUWRQJXH EDVHGGRQDQJHVSRNHQ IQ WKH6WWM UHDJIRQ UHDVRQ1RUVFKRROGRSRXWHWW OHDGIQJ WR XQUHDEOHGDWDQ ZURQJ P DQDJHP HQWIQRUP DWRQIRUSODQQIQJ

L **(UURQHRXVGDWDWVHIGHIQDWRQRI FHUWMQ1P SRUWQWLHGV** 7 KHQDP H RI WKHFKLOGDQGSDUHQWQWKHGDWEDVHVKRXOGQRWFRQWQQXP EHUVNSHFDO FKDUFWHUVHWW DVSUHFHQFH RI VXFKZRXOGOHDGWR P VQIRUP DWRQ7 KHUH ZHUH UHFRUGVRI GDWEDVHDQG UHFRUGVRI GDWEDVHZKHUHWKH QDP HVRI FKLOGDQGSDUHQWWRQWQXP EHUVWKHUHE\ FRP SURP LVQJ WKHIQWJUWRI WKHGDWDYDLDEOHIQWKHVRIWZDUH

LL **1 RUHHLHQWDOIQWJUW FKLOG** $ XGLWQRWHG WKDWWKHGDWHQW VFUHQ DFFHSWG FKLOG? WLOODJH FRGHVZKFK ZDVQRWYDOGDWEDG E\ WKH YLOODJH P DWMUGDW7 KLVUHQGHUHG FKLOGUHFRUGVRI DQG UHFRUGV RI ZLWKRXWDQ\ YLOODJH7 KXV WKHFKLOGSRSXODWRQ FRQWV VXFK YLOODJHVZRXOGP LVOHDG WKHSODQQIQJ IRUIQIUDWWXFWXUH, QWWQFHVRI VXFKFDVHVDUHDVIROORZV

, OOXWWDWRQ

&KLOG,'	9 LOODJH&RGH	5 HP DUNV
' %&[	' %* 9 [	1 RWDYDLODEOHIQ YLOODJH
' &[	' %* 9 [	GR
' %&[	' %* 9 [	GR
' %&[	' %* 9 [	GR
' %&[	' %* 9 [	GR

$ OOWKHVHFRGHVGLGQRWH[LWWQ YLOODJHP DWMUWWEOH

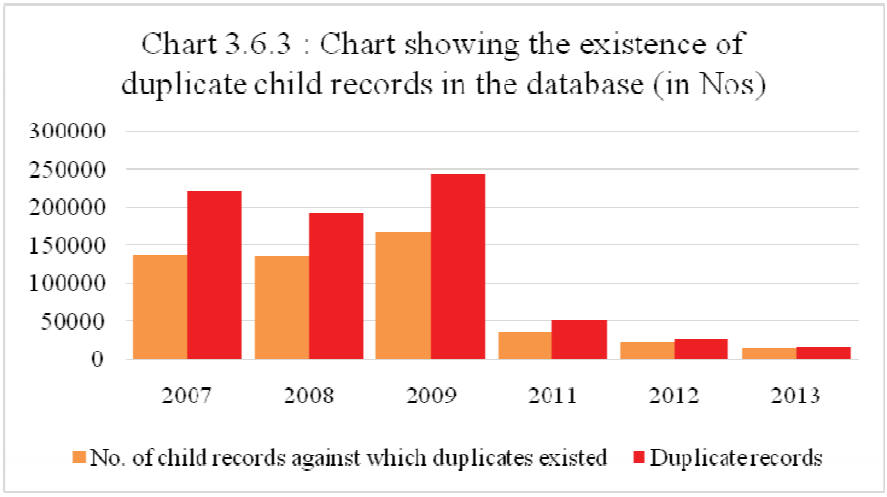
6 LP LODU GHMJ Q SUREOHP Z DV DOVR QRWFHG LQ FDVH RI VFKRROFRGHV 7 KHUH Z HUH DQG FKLOG UHFRUGV LQ WKH DQG GDWDEDVHV UHVSHFWYHO Z KHUH VFKRROFRGHV GLG QRWP DWK Z LWK WKH VFKRRO P DWMU WDEOH 7 KHVH FKLOGUHQ Z HUH QRWFRQVLGHUHG LQ WKH VFKRROZ LVH FKLOG HQUROP HQWUHSRUW

' XUIQJ GLVFXVVLRQ $ XJ XVW WKH 2 3(3$ WDWMG WKDWWKH GDWDEDVH LV WR EH UHFKHFNHG DJ DLQ 7 KH DGGHG WKDWWKH YDOLGDWRQ IRU UHOJ IRQ FRGH Z DV J LYLQJ SUREOHP LQ GLII HUHQWEURZ VHUV 7 KH 1 DFWUHP DLQHG WKDWWKH &7 6 WWOO FRQWDLQHG HUURUV

' XSOIFDWHFKLOG UHFRUGV LQ &7 6 GDWDEDVH

$ V SHU * R, LQWWXFWRQV V WMP RI YLODJ H HGXFDWRQ UHJ LWMLV 9 (5 V Z DV LQWRGXFHG DWYLODJ H OHYHO WR WDFN DOOFKLOGUHQ 1 URP \ HDV VLQFH 7 KH 9 (5 VZ HUH WR EH P DLQWDLQHG E\ WKH 9 LODJ H(GXFDWRQ &RP P LWWHV 9 (&V 2 QH RI WKH SXUSRVHV RI VXFK VXUYH Z DV WR HOP LQDWM J KRWWFKLOGUHQ Z KRVH QDP HV DSSHDULQ P RUH WKDQ RQH VFKRRO %XW+ HDG 0 DWMLV 9 (&VZ KR Z HUH UHVSRQVLEOH IRU XSGDWQJ 9 (5 V GLG QRWP DNH UHJ XODU XSGDWRQ 1 RU Z KLFK 2 3(3$ LQWRGXFHG H 9 (5 V WMP DI WMUFRQGXFWQJ DI UHVK KRXVHKROG VXUYH LQ &KLOG&HQVXV DW D FRVWRI C FURUH 7 KLV GDWDEDVH Z DV YDOLGDWMG LQ DWD FRVWRI C FURUH , WZ DV XSGDWMG LQ VXEVHTXHQW HDUV XS WR H[FHSWIRUWKH \ HDU

$ QDO VLVRI DERYH FKLOG GDWDEDVHV UHYHDOHG WKDWLQ FDVH RI OONK FKLOGUHQ NH LGHQWLIHUV OONH QDP H GDWM RI EILUK J XDUGLDQ QDP H DQG YLODJ HFRGH Z DV H[DFWO WKH VDP H LQGLFDWQJ GDWD UHGXQGDQF\ 7 KLV DOVR LQGLFDWMG SRWLELOW RI J KRWW FKLOGUHQ LQ VFKRROV 7 KH SUHVHQFH RI J KRWWLQWWQFHV KDG GLUHFWLP SOIFDWRQ RQ * RYHUQP HQWH[FKHTXHULQ VR 1 DUDVP LG GD\ P HDO 1 UHH WM[WERRN XQLIRUP HWV DUH FRQFHUQHG EHVGHVZ URQJ UHSRUWQJ RI WRWDOILJ XUHVIP SDFWQJ WKHSODQQLQJ



7KHVH GXSOLFDWH ZHLJKWV SURGXFH D FKLOG UHFRUG IQP RUHWKDQ RQH VFKRRO FODVV GDWHQW HURUVDQG VRIWZDUH SURELOP VONHDEVHQFH RI YDOLGDWRQ 7KLV OHG WR LQFRUUHFW &76 UHSRUWRQ JURWHQURP HQWUDWRQ DQG QHVHQURP HQWUDWR ZKIFK DUHXVHGDVYLDOSDUP HWUVIRUVFKHP HSODQQIQJ

' XUIQJ GLVFXVRQ \$ XJXVW &RP P LWRHUFXP 6HFUHWDU\ DJUHGDQG WRDMG WKDWKLVZRXOGEHWNHQFDUHRI E\ IODJIQJ GXSOFDWHFKLOGUHFRUGVEDVHGRQQP H RI WKHFKLOG SDUHQWQP H GDWRI EILWKDQG YLOODJHIQWKHVRIWZDUHIURP

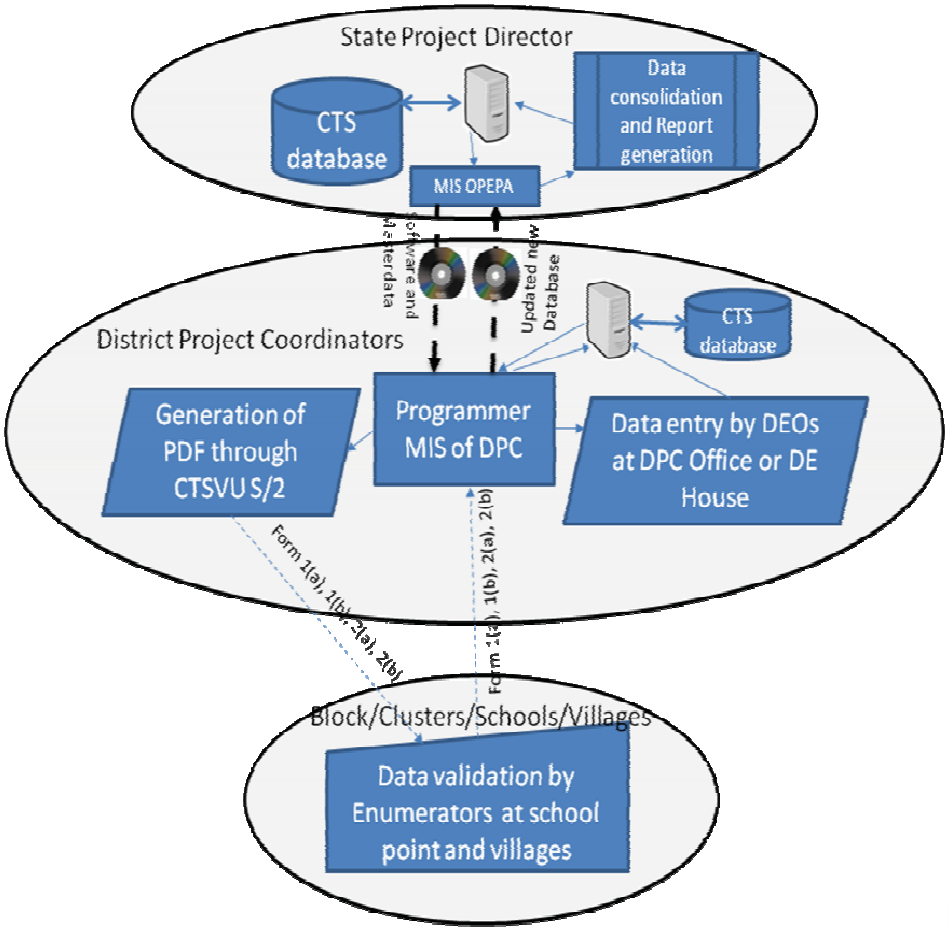
,UHIXODUXSGDWRQRI &76 GDWD

' HVSLWHFRP P HQGDWRQP DGHIQHDUHU\ XGLW5 HSRUWRWR WNHIQWRDOVEHV DWV GLWFFWOMHOIRUSURP SWSHUIRGFDQG LHJXODUXSGDWRQRI GDWEDVHEHFRP IQJ XQHDEOHDQG IQFRUHFW

' DWXSGDWRQ WR &76 ZDVDQ DQXDOSURFHVV 7KHFKLOGUHFRUGVRI WKHHDOOHU\HDU ZHUHSUIQWGE\ WKH' 32 VIQ\SHFILIHGIRUP DW YLOODJHZLVH VFKRROZLVHIURP WKHVV\VWP DQGGLVWEXWGWR WKH9 (&RI HDFK YLOODJHDORQJ ZLWKEODQNIRUP DW WKURXJK WKHUHPSHFWVH %RFN 5HVRXFH &HQWU &RRGLQDWRU %5 && &OXVWU 5HVRXFH &HQWU &RRGLQDWRU &5 && 7KHVHSUIQWGUHFRGVZHUHYDOGDWGE\ HQXP HDURUV+HDGDWWMVWMFKLVIURP P DQXDODWWQGDFHUHFRGVDGP LWRQ UHJLVWMVIRUIQVFKRROFKLOGUHQDGIURP KRXVHVXUYH IQFDVHRI FKLOGUHQZKR ZHUHRXWRI VFKRROWDDVHUHGWRRWKHUVFKRROVQ FDVHZKHUHDFKLOGZDVIQWKH ODWEXWZDVQRWQWKHVFKRRODWWQGDQFHUHJLWMUWKHHQXP HDURUP DUNHGWKHFKLOG UHFRUGDVGHOHWMGWDQVHUHGWRRWKHUVFKRROVQ,QFDVHZKHUHDFKLOGZDVIQ WKH ODWEXWZDVQRWQWKHVFKRROWDDVHUHGWRRWKHUVFKRROVQ,QFDVHZKHUHDFKLOG UHFRUGVGHOHWMGWDQVHUHGWRRWKHUVFKRROVRUWRRWKHUVFKRROHWDVWKHFDVHP D EH DQGDJDLQQWHIWMQJ FKLOGUHQ XSGDWGWKH FODW RI WKHFKLOG SHUFHQWMH RI P DUNVVHFXUHGQXP EHURI DWWQGDQFHVHWQ WKHIRUP DW7KHYDOGDWRQSURFHVZ DVUHYLHZHGE\ WKH&5 &&V%5 &&V7KHVHYDOGDWGP DQXDOUHFRUGVZHUHVHQW WR WKH' 32 ZKHUHGDWIRUP WKHVHUHFRGVZHUHHQWHUHGQWR WKH &76 7KH GLVWMFWWKHQVHQWKKLVGDWWR WWDWHRUDDGPQ7KHQHZRUNDGP IQLVWMRU DQGSURJUP P HURI WKH6WDWH3URMHFW2IIIFHXVHGWRFRQVROGDWHGDWDIQWKH 6WDWHVHLYHU)RUWKLVNRE WKH2 3(3\$ SDJG SHUFKLOGWKHQXP HUDWRVIRUGDWD FROOHFWRQDQGG SHUFKLOGIRUGDWDHQWIRUWKH\HDV DQG

) RUP D=,Q6FKRO&KLOGUHQDQG) RUP E=1HZ FKLOGUHQVFKRROEODQNIRUP

) RUP D=2 XWRI6FKRO&KLOGUHQ) RUP E=1HZ RXWRI VFKRROFKLOGUHQEODQNIRUP



□

$ XGLWREVHUYHG WKDW WKLV HQWLWHGDWD XSGDWRQ SURFHVV ZDV FRP SURP LVHG GXULQJ □ □□□□□ZKLFK UHVXOWHG LQ XQHODEOHG HLQIRUP DWRQ IQ WKH&7 6 GDWDEDVH□□

*□ ' DWD XSGDWRQ XVLQJ EDFNHQG VFULSWV HGRQ HLDVWQJ GDWD 7KH□ &7 6 DSSOLFDWRQ ZDV GHMJQHG IQ DP DQQHUWKDWHYHU GDWD HQWU □□ XSGDWRQ E\ XVHUZRXOG WJ JHUWKHFDSWXUHRI HLFDWWP HRI FUHDWRQ □□ XSGDWRQRI UHFRUGXS WRP IQDVHRQGOMYHOQWKHGDWEDVH□□

$ FRP SDUVRQ EHWZHQGDWRI FUHDWRQ FKLOGGDWRI □□□□□DQGWKDW RI □□□□□UHYHDOHGWKDWWP HRI FUHDWRQ DFKLOGUHFRUGRI □□□□□ZDV HLFWV VP HIQWKHFRUHSRQGLQ UHFRUGRI □□□□□ZKLOH\HDUSRWRQRI FUHDWRQ GDWRI □□□□□ZDV IQFUHDVHGE\ □RQH IURP □WKDWRI □□□□□IQ □ UHSHFWRI □□□GLVWLFWDQGE\ □WZR IQFDVHRI □RQHGLVWLFW* DQWP □IQ □□□□□□□□□□□□□□□*SHUFHQWFDVHVRXWRI □□□□□□□□□□UHFRUGVDVGHMOHGIQ □ *$SSHQGL[□□□□□□□□$ QLOXWDRQRI VXFKFDVHVIVDVEHORZ □□

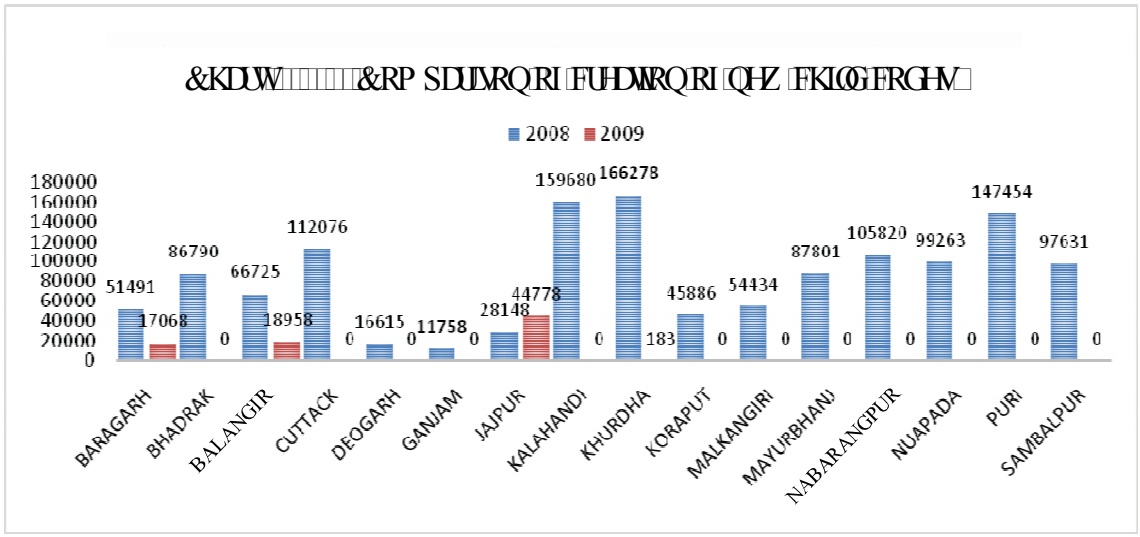
□

,QXVWUXFWLRQV	6DPSOH&DVHV%KDGLDN'LVWULFW&RXUW RI:HGJHZRUWK&RXQW\ P DUNVDQGLDWRQGDQFHRI'FKLOGGXULQJ:HHN\HDUV DQG&UHVSHFWIXO)

&KLOG,'	' DWHRI&RQWDFW	&ODVV	0 DUN VHFXUHG	$ VVLQGDFH	' DWHRI&RQWDFW	&ODVV	0 DUN VHFXUHG	$ VVLQGDFH
' %&[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
' %&[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
' %&[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
' %&[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
' %&[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
' %&[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
' %&[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
' %&[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
' %&[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
' %&[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

$ VLGXVWDDG DERYH LWLV HYLGHQWKDWKHGDDXSGDWRQ SURFHVV DV GRQHE\ UXQQLQJ EDFNHQG SURFHGXUHV RQ WKH HLWQJ GDW &ODVV RI HDFK FKLOGGXULQJ ZDVLQFUHDVHGE\ RQHIQ ZKHUHDVP DQVVFXUHGDQGWRWDOGDWQGQFHVDJLQWHPLQHGE\ RQHIQ WKH\ HDV7KXV SHUFHQWDJH RI VHDFKFKLOGGUHP DLQHGVP HIQERWK WKH\ HDV7KXV *HQHUDOO\ FKLOGUHP DQG WKHLU FKLOGGXHP DLQHGVP HIQ WKURXJK WKH GHIQHGGDWHQW SURFHVVDWGLVWFWDOYHO

* 1RQHZ FKLOGFRGHVJHQHUDWHG 7KHHQXP HUDWRUVUHIXUHGWRFRQHFW WKH FKLOGUHQ GDW IURP VFKRROVDQG YLOODJHV UHJDGLQJ FKLOGUHQ DGP LWGIRUTILWWP HIQ VFKRRODQGQHZ() IGHQWLHGRXWRI VFKRROIQ IRUP EDQGIRUP EUHSHFWYHO) KLOHHQWMIQJ WKHVHGDWIQR WKHGDWEDVHQHZ FKLOG,' VDUHJHQHUDWGE\ WKHVV WWP)RUWKH\HDV DQG QHZ FKLOG,' VZHUHIRXQG FUHDWGUHSHFWYHO)



%XWGXUIQJ QR QHZ ,' VZ HUH J HQHUDWG IQ GLVWUFW IRUZ KIFK SUHYIRXV \ HDU∂ V GDWDZ DV XSGDWG WKURXJ K EDFNHQG SURFHGXV Z KHUHDV J HQHUDWRQ RI QHZ ,' VUDQJ HG IURP WR IQ IQGLFDWQJ FRS \ IQJ RI SUHYIRXV \ HDU∂ V GDWD , Q UHP DIQIQJ IRXUWWFW %DUJ DUK %DODQJ IU - DMXU DQG KRUGKD J HQHUDWRQ RI QHZ ,' V IQ UDQJ HG IURP WR Z KHUHDV VDP HZ DV WR IQ IQGLFDWQJ P D[IP XP FRS \ IQJ RI SUHYIRXV \ HDU∂ V GDWD ' WUFW Z LVH DOORW HQWRI QHZ FRGHV GXUIQJ DUH GHWDLOHG IQ $ SSHQGL[

: H DOVR QRWFHG WKDWWKH GDWD XSGDWRQ E \ XVIQJ EDFNHQG VFUISWKDG RFFXUUHG IQ HDUOHU \ HDUV DVZ HOO

* 7 IP H RI FUHDWRQ RI FKLOG UHFRUG Z DV ≥ ¥ 7 KHUH Z HUH SHUFHQW FKLOG UHFRUGV RI SHU FHQW FKLOG UHFRUGV RI DQG SHUFHQW FKLOG UHFRUGV RI Z KHUH WP H RI YDOLGDWRQ FUHDWG GDWM Z DV µ ∂] HUR KRXUV] HUR P IQXWV] HUR VHFRQGV] HUR P IOOLVHFRQGV LH WKDUS DW P IGQIJ KW IQ DOO GLVWUFW DV J LYHQ IQ $ SSHQGL[, WZ DV XQOINHO WKDW WR SHUFHQW RI HQWUHV Z HUH P DGH DWWKDWRQH WP H 7 KLV IQGLFDWV SRWLEOOW WKDW GDWDEDVH Z DV WP SHUHG E \ Z D RI FRS \ IQJ RI FKLOG UHFRUGV IURP GDWDEDVH RI SUHYIRXV \ HDUV

* &RS \ RI FKLOG UHFRUGV IURP GDWDEDVH $ QDO VLV DOVR UHYHDOHG UHFRUGV RI UHFRUGV RI DQG UHFRUGV RI Z HUH VIP SO FRSIHG IURP WKH GDWDEDVH DV GDWM RI FUHDWRQ

RI UHFRUGVRI DJDLQWWHDFK VXFK FKLOG Z DVH[DFW WKH VDP HLQ WKH
WDUJHWWDEOHV LH DQG WDEOHVUHVSHFWYHO

(YLGHQFH RI VXFK FRS\ LQJ RI UHFRUGV LH UHFRUG FUHDWRQ GDWH Z DV DOVR WDP SHUHG
Z LWK

7 R DQ DXGLWTXHU WR LXUQLVK WKH DQQXDO &7 6 GDWD' 9 ' V VXEP LWWGE\ WKH GLVWUFW
GXUQJ WR 6 WDWH IRUFRQVROGDWRQ WKH 63 ' WDWHG WKD WDOOWKHVH' 9 ' VJ RW
GDP DJ HG DQG FRXOG QRWEH LXUQLVKHG WR DXGLW

) URP WKH DERYH LWFDQ EH QRWFHG WKDWE\ SDVVLQJ WKH XSGDWQJ SURFHVV GDWD Z HUH
HQWHUHG LQWR WKH GDWDEDVH E\ P DQLSXODWQJ GDWD IURP WR 7 KLV
XQDXWKRULVHG XSGDWRQ FDQ EH DVFHUWDQDEOH LQ Z KHQ P D[LP XP FRS\ LQJ RI
UHFRUGV Z DV REVHUYHG LQ GLVWUFW DQG SD\ P HQWRI C ODNK Z DV P DGH
WRZ DUGV GDWD HQWU DQG GDWD FROOHFWRQ 7 KLV LQFOXGHG SD\ P HQWRI C ODNK
WR WKH H[WHQWRI GDWD XSGDWG WKURXJ K EDFNHQG TXHU

6 XFK LUUHJ XODU XSGDWRQ P DGH WKH GDWDEDVHV XQUHODEOH DQG LQFRUUHFW Z KLFK
LQGLFDWG WKDWWKHUH Z DV QR VXSHUYLVRQ RQ WKH TXDOW RI GDWD LQ WKH &7 6 GDWDEDVH
7 KLV KDG DOVR DI IHFWG WKH UHDORXWRP H RI WKH SURMHFW LH SODQQLQJ UHQGHULQJ WKH
GDWDEDVH XQXVDEOH

' XULQJ GLVFXVVLRQ $ XJ XVW &RP P LVVLRQHUFXP 6HFUHWDU H[SUHVVHG GHHS
FRQFHUQ RYHU VXFK DFWYLWHV Z KLFK GDP DJ HG UHSXWDWRQ RI WKH SURMHFW DQG
HQTXLUHG IURP 2 3(3$ WKH EDVLV RQ Z KLFK SD\ P HQWRQ GDWD HQWU Z DV P DGH
5 HSO IURP * RYHUQP HQWKDV QRWEHHQ UHFHLYHG $ XJ XVW

, QDFFXUDWHLQIRUP DWRQ WR WDNHKROGHUV

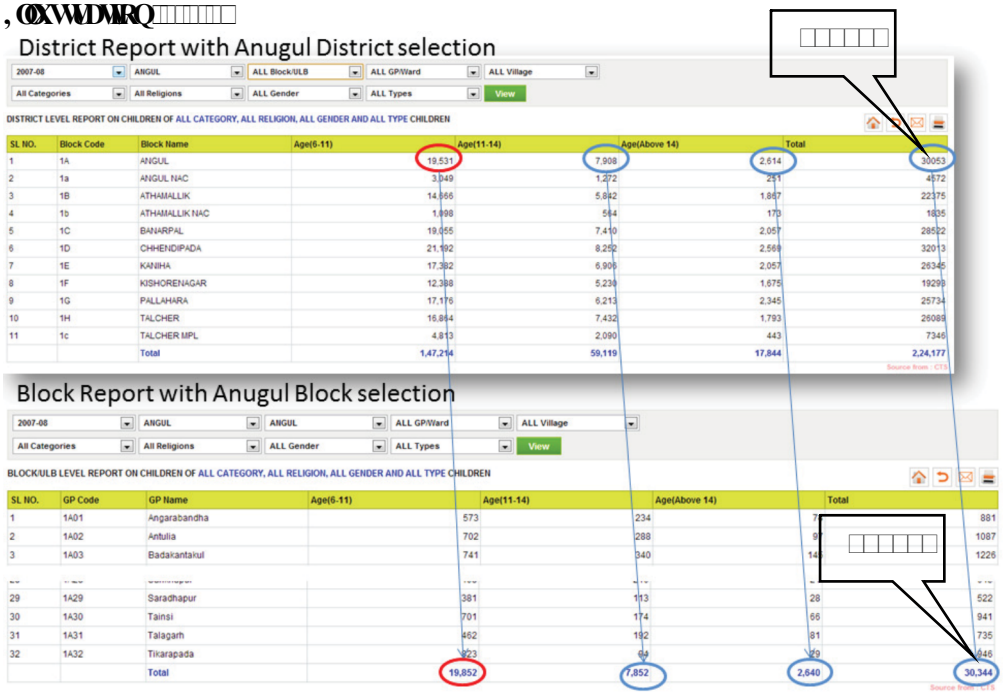
$ V SHU 3 DUD RI * XLGHOLQHV IRU, QGLDQ * RYHUQP HQW HEVLWHV HDFK DQG
HYHU EIWRI FRQWHQWSXEOLVKHG RQ D * RYHUQP HQW Z HEVLWH VKRXOG EH YHUILHG DQG
FKHFNHG WKRURXJ KO DV WKH SXEOF H[SHFW QRWKLQJ OHV WKDQ DXWKHQWF DQG DFFXUDWH
LQIRUP DWRQ IURP D FUHGLEOH VRXUFH VXFK DV DQ RIILFLDO * RYHUQP HQW Z HEVLWH
, QFRUUHFW UHSRUW Z LOOQRWRQO P LVOHDG WKH WDNHKROGHUV EXW Z LOOD LIHFW WKH XVH RI
LQIRUP DWRQ IRU GHFLVLRQ P DNLQJ SURFHVVHV

$ QDO VLV RI WKH FLW] HQ FHQWUF UHSRUW UHYHDOHG LQFRQVLVWHQFLHV GLVFUHSDQFLHV LQ
WRWDO IIJ XUH DP RQJ GLVWUFW EORFNV DQG J UDP SDQFKD DWOHYHO UHSRUW UHJ DUGLQJ
FKLOG SRSXODWRQ FKLOG HQUROP HQW RXWRI VFKRRO FKLOGUHQ GURSRXW WDFKHUV
WWHQJ WK HW) RU H[DP SOH WKH IROORZ LQJ µ5 HSRUWRQ 7 RWDO &KLOG 3 RSXODWRQ
VKRZ HG WKH FKLOG SRSXODWRQ RI $ QJ XO EORFN DV LQ WKH GLVWUFW UHSRUW

FKLOG UHFRUGV DWWKH UDWRI C
3 UHSDUHG E\ WKH' HSDUWP HQWRI $ GP LQLWWDWYH5 HIRUP V DQG 3 XEOF * UHYDQFHV LQ DVVRFLDWRQ
Z LWK' HSDUWP HQWRI , QIRUP DWRQ 7 HFKQRORJ \ DQG 1 DWRQDO, QIRUP DWV &HQWH 1 , &

Z KHUHDV WKH WRWDOFKLOGSRSXODWRQRI DOOWKH * 3 VIQ $ QJ XOEORFN VKRZ HG IQ WKHEORFN UHSRUWDVGHSIFWGEHORZ

, OOXVWDWRQ



6 IP LODU GLVFUHSDQFLHV IQ RWKHU UHSRUW DUH GHWDLOHG IQ $ SSHQGLI ' XH WR HUURUV IQ GDWD DQG VRI WZ DUH RI H 6 LVKX FRXSOHG Z LWK IQFRKHUHQWFRQVROLGDWRQ RI GLVWLFW GDWD IQ 6 WDWH VHLYHU UHSRUWQJ V VWP J HQHUDWG IQFRQVLVWQW DQG XQUHODEOH UHSRUW Z KLFK FRXOG QRWEH XVHG IRU SODQQLQJ * XLGHODQHV IRUP DQDJ IQJ J RYHUQP HQW Z HEVLWH Z HUH QRW IROORZ HG DV WKH FRQWQW RI VLWH KDG EHFRP H XQUHODEOH GXH WR SUHVHQFH RI IQFRQVLVWQW IQIRUP DWRQ $ WWKHIQVWQFH RI DXGLWWKH HUURUV IQ WKH UHSRUW Z HUH UHFWLIHG E \ 2 3 (3 $ $ XJ XVW

' XUIQJ GLVFXVVIRQ $ XJ XVW WKH 2 3 (3 $ DJ UHHG WKDW HUURUV Z DV GXH WR GHOD \ IQ FRQVROLGDWRQ RI IQIRUP DWRQ

%DFNXS DQG VHFXULW FRQWROV

, QIRUP DWRQ EDFNXS DQG VHFXULW SROLF \ VKRXOG WDWH P DQDJ HP HQW FRP P LWP HQW DQG VHWRXWRU DQLVDWRQ ? V DSSURDFK WR P DQDJ IQJ IQIRUP DWRQ VHFXULW IQ RUGHU WR DFKLHYH J RDOV RI WKH RU DQLVDWRQ , QIRUP DWRQ VHFXULW SROLF \ P D \ EH GRFXP HQWG DQG FRP P XQLFDWG WKURXJ KRXW WKH RU DQLVDWRQ WR XVHUV IQ D IRUP WKDW LV DFFHVVLEOH DQG XQGHUWDQGDEOH WR WKH IQWQGHG UHDGHU

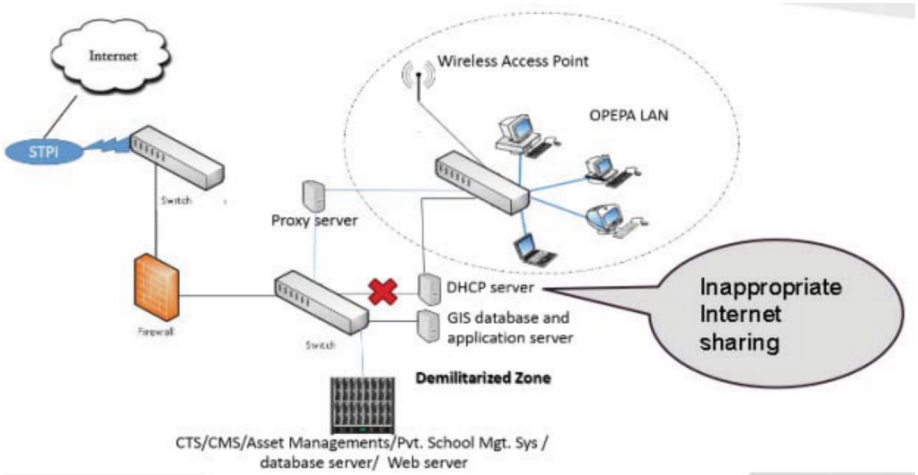
2 3(3$ KRZ HYHU KDG IDLOHG IQ IUDP IQJ VHFXULW DQG EDFNXS SROLF\ DQG WR GRFXP HQWLWSURSHUO Z KIFK KDG P DGH WKH ,7 V VWP V DQG DWHW YXOQHUDEOH WR VHFXULW ULVN DV GLVFXVHG EHORZ

* ,Q 2 3(3$ QR IQIRUP DWRQ VHFXULW SROLF\ GRFXP HQWH LVWMG WR SURWFW YDOXDEOH ,7 DWHW ' DWD DQG EDFNXS SROLF\ Z HUH QRW GRFXP HQWMG DQG P DIQWDIQHG DW 2 3(3$ ' DWDEDVHV Z HUH P DQXDOO EDFNHG XS WR D GIII HUHQW IROGHU IQ WKH VDP H VHUYHU Z HHNO DQG WKHQ FRSIHG WR H WMQDO KDUG GLVN Z KIFK VKRXOG KDYH EHHQ DYRIGHG DV EDFNXS V NHSWIQ WKH VDP H VHUYHU FRXOG OHDG WR QRQ UHWRUDWRQ IQ FDVH RI GLVDWMU 6 \ VWP IQVSHFWRQ DOVR UHYHDOHG WKDW WKH VFKHGXOHU IRU EDFNXS Z DV QRW DFWYDWMG 1 HWZ RUN DGP IQLWWDWRU H SODIQHG WKDW GXH WR ODFN RI VSDFH IQ WKH VHUYHU VFKHGXOHU FRXOG QRW EH DFWYDWMG DV IWZ RXOG FUHDWMODJ HQXP EHUR I EDFNXS IILOHV DQG WKXV EDFNXS V Z HUH P DQXDOO P DGH DQG FRSIHG WR DQ H WMQDO KDUG GLVN Z HHNO ' RFXP HQWMG EDFNXS VWMWQJ SURFHGXUHV DQG WKH EDFNXS KDUG GLVN KRZ HYHU Z DV QRW VKRZ Q WR $ XGLW %DFNXS V KDG QRW EHHQ NHSWIQ D J HRJ UDSKIFDO GLVWDQWSODFH DQG Z HUH QRW UHJ XODUO VWMWMG DQG P RQLWRUHG

* 6 HUYHU V Z HUH FRQQHFWMG WR IQWMQHWWKURXJ K D IILUHZ DOO EXWGH DXOWVHWIQJ RI WKH VHUYHU DQG IILUHZ DOO Z HUH QRW FKDQJ HG DI WMU IQWMOODWRQ RI OYH V VWP V P DNIQJ WKH V VWP V YXOQHUDEOH WR H WMQDO DWDFNV DV WKHVH Z HUH IQ ' HP IODWDUVHG =RQH ' 0 = ' H DXOWXVHU *LH* ≥ DGP IQLWWDWRU¥ Z DV QRW GLVDEOHG IQ DOO WKH VHUYHU V DQG WKHUH Z HUH FRQWQXRXV DWWP SW IURP DQ H WMQDO ,3 XVIQJ µDGP IQLWWDWRU∂ DV XVHUQDP H WR ORJ IQWR WKH VHUYHU V DSSOFDWRQ DQG GDWDEDVH Z KIFK Z HUH DQ DWWP SW WR KDFN WKH V VWP V) IUHZ DOOORJ V Z HUH QRW P RQLWRUHG

* $ WDSSOFDWRQ OHYHO WKH DFFHW DXGLWORJ V RI WKH VHUYHU IQWMQGHG IRU DFFRXQWDEIOLW RI DXWKRUIVHG WDQVDFWRQV Z HUH QRW P RQLWRUHG &6 &0 6 DSSOFDWRQ GLG QRW FDSWXUH DFFHW DXGLWORJ V DV WKH WDEOH WR FDSWXUH VXFK ORJ V FRQWDIQHG QR UHFRUGV IRU P RQLWRUIQJ SXUSRVH 7 KLV IQGIFDWMG WKDW WKH DSSOFDWRQ KDG QR SURYLVIRQ WR VDYH DFFHW ORJ V

* 7KHUHZDVDSUR[\ VHUYHUEXW$ XGLWQRWFHGWKDWWKRFDWRQRYHUWKH/$ 1 ZDVIQDSSURSULDWHDV\VWHP VRYHU/$ 1 DFFHVVHGWKHIQWHUQHWWKURXJKWKH ' +&3 VHUYHUDQG E\SDVVHGWKH SUR[\ VHUYHU7KLV PDGH V\VWHP V YXOQHUDEOHWR P DZDUHDQG7URMDQDWWDFNVDVQRFRQWHQWILOWHULQJFRXOGEH HQFRUHGIQSUR[\ VHUYHU7UDIILFRXOGQRWEHP RQLWRUHGDVIQWHQGHGZDV DYDLODEOHWRXVHUVGLUHFWO\WKURXJK' +&3



* 23(3$ KDGGHMQHGQHWZRUNDQGVHUYHUDFKLWHFWXUHWR P DIQWQQYDUIRXV DSSOLFDWQQV\ WMP V7KHVHUYHUVZHUHKRXVHGIQDQHQFORVHGURR P ZLWKRXW IILHE[WQJXLVKHU

' XHWRDEVHQFHRI DSSURSULDWHDFNXS DQGVHFXULW\SROLFLHV7 \ WMP DQGDWHW ZHUHSURQHWRVHFXULW\ULVN

' XULQJGLVFXVVLRQ $ XJXVW WKH&RP P LWWHHUHFRP P HQGHGVHFXULQJWKH IDFW

&RQFOXVLRQ

7KHUHFRP P HQGDWQQVP DGHIQWKH3DUDJUDSK RI&&$ * ∂ V5HSRUWWDYLO IRUWKH \HDUHQGHG0 DUFK ZHUHDFFHSWHG E\ WKH2GLVD3UP DV (GXFDWQQ 3URJUDP H $ XWKRUWW2 23(3$ 2 QDIRORZ XS DXGLWZHIRXQGWKDWWKHVH UHFRP P HQGDWQQVZKFK ZHUHWKOOSHWQHQWZHUHORWFDUULHGRXW7KHVXE V WMP V(3,6 *,6 DQG&76 XQGHUWKHH6LKXSURMHFWZHUHUHYLHZHG HIRXQG WKDWWKHVFRSHRI P SOP HQWDWQRI (3,6 JRWWHYHUHV FXWMOHGDQGLW SUP DV REMHFWLYHVDNHYDFDF\ WDFNQJRI WKFKUVUHP DQXQLXOLQHG7KH*,6 RIWZDUH FRQWQHGHURVDNHZURQJGHSIFWQRIORFDWQP LWQJSKRWUDSKVHW ZKFK IQKIEWWGKDEWWQRED DQDOVLVDQGUHQHUHGWKH*,6 XQIWRUXVE\ WKHWRS P DQDJHP HQWRI 23(3$,QFDWHRI WKH&76 ZHIRXQGWKDWWKHXQITXHFKQGZ DV QRWDGGUHVHGDQGQRWEHYQDGRSWGIQWKHDSSOFDWQQXSJUDGHGXUQJ 7KXV REMHFWLYHRI &76 WR WDFNHDFKFKQGIRUHGXFDWQQOOQGHFRP P IF WWXVFRXG

QRW EH DFKLHYHG.)XUWKHU, ZH IRXQG D JURVV GHYLDWLRQ IURP ODLG GRZQ SURFHVV RI DQQXDO GDWD XSGDWLRQ IRU ZKLFK IXQGV ZHUH DOORWWHG DQG VSHQW. 6LJQLILFDQW SURSRUWLRQ RI *SHUFHQW* RI FKLOG UHFRUGV ZDV XSGDWHG UXQQLQJ EDFNHQG VFULSWV WKHUHE\ YLWLDWLQJ WKH SURFHVV DQG UHQGHULQJ WKH WRWDO LQIRUPDWLRQ XQUHOLDEOH DQG LQIUXFWXRXV. 7KHUH ZHUH DOVR GHILFLHQFLHV QRWHG LQ WKH VHFXULW\ DQG EDFNXS SURFHGXUH. 7KXV, WKH NH\ REMHFWLYHV RI H-6LVKX V\VWHP WR WUDFN HDFK FKLOG, PLQLPLVH GXSOLFDWH HQUROPHQW DQG IRUPXODWLRQ RI SODQV WR SURYLGH TXDOLW\ HGXFDWLRQ UHPDLQHG ODUJHO\ XQIXOILOOHG.

%KXEDQHVZDU **$PDU 3DWWQDLN**

7KH **$FFRXQWDQW *HQHUDO (* 66$)**

2GLVKD

&RXQWHUVLJQHG

1HZ 'HOKL **6KDVKL .DQW 6KDUPD**

7KH **&RPSWUROOHU DQG $XGLWRU *HQHUDO RI ,QGLD**