



Have peace of mind. Trust the experts.

Delta Data is uniquely positioned to support the broker-dealer community in remediation efforts and establishing an ongoing supervisory system supporting your AWC. Using our unique industry knowledge, we offer superior SaaS solutions and finely-honed historical industry data to deliver an option specific to your needs regarding the sweep.

VALUE AND BENEFITS

Delta Data Fee Waiver Remediation Includes:

Creates a cross-reference of your account types mapped to the group retirement social codes found in the Profile II Security Issue database.

Loads your A Share trades into the Delta Data proprietary database – for those account types that may be subject to A-share waivers.

Identifies Load Trades – creates an output file identifying trades where sales price does not equal NAV.

Identifies Highly Suspect Trades – refines output file now identifying trades that also contain social codes that are eligible for a sales load waiver as well as our proprietary waiver file.

Extends a subscription license to you for software tools for further internal analysis identifying waiver eligibility (more details below).

Provides you with additional information on A shares identified as “highly suspect,” such as:

- Social Codes applied (if any)
- Determine Sales Load Paid (based on a NAV purchase price)
- Calculate interest on the sales load from purchase date through remediation date according to IRC Reg. 6621(a)(2)

Loads B/C share trades from your data file into the Delta Data database to:

- Identify if an A-share load waiver option was available at the time of transaction

- Calculate financial costs of B/C share purchase over A share waived purchase using the AWC stated expense differential of 75 basis point amount plus interest, per IRC Reg. 6621(a)(2)
- Apply the CDSC fee plus applicable interest from the time of the redemption for traded B/S shares that involved a CDSC fee

Calculates CDSC fee if B/C shares were transferred to another firm, to include:

- Fictitious CDSC fee calculation to be paid to your client as part of the restitution
- Interest from the date of the transfer according to IRC Reg. 6621(a)(2)

Delivering documentation that supports and defines your best efforts to remediate historic trades per AWC and establishing an adequate supervisory system.

Ongoing Supervisory Support

- In a similar fashion to historic remediation, clients provide a trade file on a pre-determined frequency to identify missed waivers.
- Delta Data maintains and updates our waiver file ongoing.
- To support post-trade monitoring software, we can provide this to be loaded into any compatible software to support your ongoing supervisory efforts.

Software

As part of Delta Data's Fee Waiver Remediation and Ongoing Support, you will have access to software that offers

- General security mutual fund rules-based compliance data, including breakpoint pricing rules, redemption fee rules, minimum/maximum purchase amounts, load information, ROA, blue sky information, and more.
 - Users can set up an unlimited number of subsets of mutual fund securities as portfolios and track changes for any or all desired data points.

- Client-defined extracts can be configured in the user interface to track any or all changes to securities — or just additions and deletions.
- A web-based repository of compliance documents for mutual fund securities and other pooled investment products delivering immediate and low-cost access to critically essential securities information, including:
 - A web-enabled user interface with complete index search capabilities and intuitive navigation.
 - A comprehensive repository of over 240,000 current EDGAR filings for over 43,000 securities that are updated on a nightly basis to include: Summary prospectuses, statutory prospectuses, SAls, stickers, annual and semi-annual shareholder reports.
- Rich industry data sets including:
 - Price and accrual data service – in near real-time, receive vetted prices and rates
 - Series ID Table – updated and refreshed data to support B/C remediation
 - Proprietary A Share Waiver List - a composite of the signed AWCs from several primary broker-dealers, our internal efforts scouring prospectus, and feedback and revisions where necessary from FINRA