

Interpretation of the Emerging Accounting Issues Working Group

INT 00-11: EITF 98-15: Structured Notes Acquired for a Specified Investment Strategy

ISSUE NULLIFIED BY SSAP NO. 43R

INT 00-11 Dates Discussed

March 13, 2000; June 12, 2000; September 11, 2000; August 31, 2012

INT 00-11 References

SSAP No. 43R—Loan-Backed and Structured Securities (SSAP No. 43R)

SSAP No. 45—Repurchase Agreements, Reverse Repurchase Agreements and Dollar Repurchase Agreements (SSAP No. 45)

SSAP No. 91R—Accounting for Transfers and Servicing of Financial Assets and Extinguishments of Liabilities (SSAP No. 91R)

SSAP No. 98—Treatment of Cash Flows When Quantifying Changes in Valuation and Impairments, an Amendment of SSAP No. 43—Loan-Backed and Structured Securities

that paragraph 11 (Accounting for Transfers of an Entire Financial Asset or Group of Entire Financial Assets) of FAS 166 should be applied to each structured note upon transfer. This revision to EITF 98-15 does not impact the previous conclusion to reject this EITF for statutory accounting.

45. No further discussion is planned.