

Summary of New Form PF FAQs Released on January 18, 2017

Question Number	Section A: General Filing Information	
A.10	Question	My principal office and place of business is outside the United States. For purposes of Form PF, General Instruction 1 allows me to disregard any private fund that, during my last fiscal year, was not a United States person, was not offered in the United States, and was not beneficially owned by any United States person. How should I treat parallel managed accounts?
	Answer	For purposes of Form PF, if your principal office and place of business is outside the United States, you may also disregard any parallel managed accounts that, during your last fiscal year, were parallel to private funds that are disregarded in reliance on General Instruction 1 and were not managed for any United States persons.
A.11	Question	Instruction 16 states that I am not required to update information that I believe in good faith properly responds to Form PF on the date of filing, even if that information is subsequently revised. Given that instruction, if my fund's auditor has not yet completed its audit of the fund's financial statements for the fiscal year for which I am reporting Form PF, how should I respond to questions requiring information from those financial statements such as Question 14? Should I file information from the previous fiscal year's completed audited financial statements, or should I make an estimate of the current year's financial statement information?
	Answer	You should use the estimated values for the fiscal year for which you are reporting, even if the audit of the financial statement has not yet been completed by the time you file Form PF. You can provide an explanation that the information is an estimate in Question 4. You may, but are not required to, make an amendment to a previously submitted Form PF filing with information from the audited financial statements when the audit is complete.
A.12	Question	You should use the estimated values for the fiscal year for which you are reporting, even if the audit of the financial statement has not yet been completed by the time you file Form PF. You can provide an explanation that the information is an estimate in Question 4. You may, but are not required to, make an amendment to a previously submitted Form PF filing with information from the audited financial statements when the audit is complete.
	Answer	Yes.

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Question Number	Section A: General Filing Information	
3.1	Question	Question 3 asks for a breakdown of my regulatory assets under management and net assets under management. If I manage a registered investment company (i.e., not a private fund), do I need to include the regulatory assets under management that I manage for it in response to Question 3?
	Answer	Yes. All of your regulatory assets under management should be accounted for in Question 3. If certain regulatory assets under management are not attributable to the entities enumerated in 3(a)-(g), then such assets should be reported in 3(h) (“Funds and accounts other than private funds”).
20.1	Question	Question 20 requires that I indicate which investment strategies best describe the reporting fund’s strategies. For each strategy, I am required to provide a good faith estimate of the percentage of the reporting fund’s net asset value represented by that strategy. Instruction 15 states that, for Question 20, the numerator that I use to determine the percentage of net asset value must be measured on the same basis as gross asset value. In completing Question 20 for a reporting fund that has gross assets in excess of its net assets, should the total of my answers in the “% of NAV” column add up to more than 100%?
	Answer	Yes, the responses to the “% of NAV” column should generally add up to more than 100%. You should note that the requirement in Instruction 15 regarding the use of gross assets also applies to Questions 21, 25, 28, and 35.
32.1	Question	Question 32 asks about the liquidity of the reporting fund’s portfolio. The instructions to that question state that I should exclude cash and cash equivalents from the response. If my reporting fund only holds cash and cash equivalents, however, how should I respond to Question 32?
	Answer	If your reporting fund only holds cash and cash equivalents, report that 100% of the portfolio is capable of being liquidated within 1 day or less. You should note in Question 4 that the reporting fund only holds cash and cash equivalents to provide context to your responses.
32.2	Question	Question 32 asks for the percentage by value of the reporting fund’s positions that may be liquidated within specified time periods. What does the term “value” mean for purposes of Question 32?
	Answer	For purposes of Question 32, you should report the percentages of the portfolio’s net asset value that is capable of being liquidated in the time periods set forth in the question.
32.3	Question	The instructions to Question 32 require excluding cash and cash equivalents. In calculating the percentage of the reporting fund’s positions that may be liquidated within each of the specified time periods, should I exclude cash and cash equivalents from both the numerator and denominator when calculating the percentages?
	Answer	Yes.
35.2	Question	Should we consider cash and cash equivalents to be a “position” for purposes of reporting open positions in Questions 34 and 35?
	Answer	No. You should exclude cash and cash equivalents when responding to Questions 34 and 35. The value of unencumbered cash should be reported in Question 33.

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Question Number	Section A: General Filing Information	
47.1	Question	In responding to Question 47, how do I indicate that the creditor that is responsive to the question is an affiliate of a group listed in the drop-down menu, but is not an identical legal entity to the group listed?
	Answer	When a creditor is an affiliate of a group already listed in the drop down menu in Question 47, select that affiliated creditor group from the drop down menu. Do not enter the creditor's name in the space for "other." You may identify the specific creditor within the affiliated group in Question 4.
49.1	Question	Questions 49(c) and 49(e) and Questions 61(b) and 61(d) ask about the percentage of a reporting fund's net asset value that may be subjected, or is subject, to material restrictions on investor withdrawals/redemption. When responding to these questions, should I take into account every type of material liquidity restrictions associated with the reporting fund?
	Answer	The instructions to Question 49 and Question 61 note that you should make a good faith determination of withdrawal/redemption provisions that would likely be triggered during conditions that you view as significant market stress. Accordingly, when responding to these questions, you should only take into account discretionary restrictions that the adviser or fund governing body may impose on the reporting fund above any baseline liquidity restrictions an investor is already subject to in the ordinary course as terms of its investment in the fund. For example, if a fund you manage generally imposes a 1-year initial lock-up period before an investor may make withdrawals/redemptions or only allows for annual withdrawals/redemptions upon 60 days' notice, you should not take any of these restrictions into account when responding to Question 49 and Question 61 because these restrictions will be accounted for in responses to Question 50.
49.2	Question	Should I include assets subject to a side-pocket arrangement when responding to Questions 49(c) and 49(e) and Questions 61(b) and 61(d) regarding the reporting fund's net asset value that may be subjected, or is subject, to material restrictions on investor withdrawals/redemptions?
	Answer	No. You should, however, report the percentage of the reporting fund's net asset value, if any, that is actually in a side-pocket as of the data reporting date in Question 48(a).
50.1	Question	Question 50 and Question 62 ask for the breakdown of the percentage of the reporting fund's net asset value that is locked in for different periods of time. When responding to these questions, should I take into account the investor liquidity associated with each different investor, such as different lock-up periods or side-letter terms associated with different investors?
	Answer	Yes. You should evaluate the specific liquidity terms applicable to each investment as of the data reporting date, and then calculate the percentage of net asset value associated with each time period identified in the questions
61	See Question 49 above.	
62	See Question 50 above.	
63.1	Question	Question 63(f) asks for advisers to identify a category of investment that best describes each security held by the reporting fund. If the reporting fund holds derivatives, how do I identify which category applies to those securities?
	Answer	Where the reporting fund holds derivatives, report those securities as "Other" in the categories provided in Question 63(f).