

The Depository Trust Company

IMPORTANT

EXPANSION OF PAPERLESS LEGALS

B#: 389-06

DATE: October 13, 2006

TO: All Transfer Agents

CATEGORY: Operations

FROM: Joe Clemente

ATTENTION: Officers/Operations Management/Cashiers

SUBJECT: Paperless Legal Program:
Expansion to Include
All Transfer Agents

In Important Notice B# 9787-06 DTC stated its intention to expand the paperless legal program to all transfer agents and participants.

Over the past few months, DTC continued to expand transfer agent participation. Recently, DTC sent paperless legal information to all non participating transfer agents and discussed the program directly with many of those agents. As a result, participation continues to grow. Currently, 95 percent of DTC deposits are in issues with participating agents and we fully expect that percentage to reach close to 100% by year-end.

DTC, the Securities Transfer Association (STA), and the Shareholder Services Association (SSA) all view the program as a resounding success. Only one industry hurdle remains - - assisting the transfer agents that process the remaining volume of deposits to reap the benefits of the program. Both associations continue to work closely with DTC towards this goal.

Over the next few months, DTC will be monitoring the transfer agents not participating in the paperless legal program and the impact on our legal deposit activity and will continue reaching out directly to those agents. By the end of 1Q 2007, DTC will issue an Important Notice outlining what actions will be considered relating to legal deposit presentations for non participating transfer agents along with a

timetable for such actions. Next steps may include DTC no longer accepting legal deposits for issues with non participating transfer agents. These presentations would need to be delivered directly to the agent for processing.

The SIA and STA have jointly published a letter fully endorsing the Paperless Legal program, which can be found on the STA's web site at <http://www.stai.org/index.php>. The SSA has also participated in all discussions involving the Paperless Legal program and continues to strongly endorse it with its membership.

Copies of previous DTC Important Notices addressing the Paperless Legal program can be found on the DTC corporate web site at <http://www.dtcc.com>. Once on the site, look for "Quick Links" on the right hand side and click on "Important Notices." Use the advanced search feature, using "paperless" as the key word.

Transfer agents requiring assistance in joining the Paperless Legal program should contact DTCC's Sharon Pope at (212) 855-4462 / spope@dtcc.com or Karen Robinson at (813) 470-1059 / krobinson@dtcc.com.

Additional questions regarding the program can be directed to Joseph Clemente, Product Manager, DTCC at 212-855-2425 / jclemente@dtcc.com.