

**PTSC****Public  
Transportation  
Services  
Corporation**One Gateway  
Plaza, Los  
Angeles, CA 90012

213 922 4611

PTSC Board  
September 8, 2005**SUBJECT: INVESTMENT POLICY****ACTION: ADOPT UPDATED INVESTMENT POLICY****RECOMMENDATION**

- A. Adopt the updated PTSC Investment Policy, Attachment I. See proposed Investment Policy changes under "Policy Implication" below.
- B. Delegate to the PTSC Treasurer or his/her designees, the authority to invest PTSC funds for a one-year period, pursuant to California Government Code (the Code) Section 53607. See the excerpts of the Code in Attachment II.
- C. Approve the Financial Institutions Resolution authorizing financial institutions to honor signatures of PTSC Officials, Attachment III.

**ISSUE**

Section 53646 of the Code, requires that the Board, on an annual basis and at a public meeting, review and approve the Investment Policy. Section 53607 of the Code, requires that the Board delegate the investment authority to the PTSC Treasurer on an annual basis.

Section 10.8 of the Investment Policy requires that the PTSC Treasurer submit the Financial Institutions Resolution to the Board annually for approval.

**POLICY IMPLICATION**

The Board approves the objectives and guidelines that direct the investment of PTSC's operating funds. Key revisions to the PTSC Investment Policy incorporate the language consistent with finance standards and practices. A summary of changes to the current PTSC Investment Policy is provided below.



Metropolitan Transportation Authority

**Metro**

<b>Section Change</b>	<b>Current Text</b>	<b>Proposed Text</b>	<b>Rationale</b>
Section 6.3A	Internal investment manager will only purchase or sell securities from broker-dealers that are Primary Dealers in U.S. Government Securities or are a direct affiliate of a Primary Dealer.	Internal investment manager will only purchase or sell securities from broker-dealers that are Primary Dealers in U.S. Government Securities or are a direct affiliate of a Primary Dealer. Internal investment managers will only purchase securities from broker-dealers who have returned a signed Receipt of Investment Policy and completed the Broker-Dealer Questionnaire, and have been approved by the Treasurer (see Appendices B and C). A current copy of the Broker-Dealer's financial statements will be kept on file in the Treasury Department.	To combine Items in 6.3A and 6.3D.
Section 6.3D	Internal investment managers will only purchase securities from broker-dealers who have returned a signed Receipt of Investment Policy and completed the Broker-Dealer Questionnaire, and have been approved by the Treasurer (see Appendices B and C). A current copy of the Broker-Dealer's financial statements will be kept on file in the Treasury Department.		To combine Items in 6.3A and 6.3D.
Section	Companies must	Companies must	Correct Typographical

5.1A # 11	have.....inclusive and l or m: or B).....	have.....inclusive and m or n; or B).....	error.
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**ALTERNATIVES CONSIDERED**

The PTSC Investment Policy and the Code require an annual review and adoption of the Investment Policy, the delegation of investment authority and the annual approval of the Financial Institutions Resolution. Should the Board elect not to delegate the investment authority annually or approve the Financial Institutions Resolution, the Board would assume daily responsibility for the investment of PTSC working capital funds and for the approval of routine administrative actions.

**FINANCIAL IMPACT**

This action has no impact on the FY 2006 PTSC Operating budget. Investment management fees and related expenses are funded from interest income.

**BACKGROUND**

The PTSC Investment Policy provides staff and external investment managers with guidelines to enable the PTSC to maximize its return on investments subject to the primary objectives of safety and liquidity. The delegation of investment authority transfers to the PTSC Treasurer the responsibility and accountability to perform the investment function for a one-year period.

Financial Institutions require Board authorization to establish custodial, trustee and commercial bank accounts. In accordance with the PTSC’s Investment Policy, staff reviewed the resolution and determined no changes were needed.

**NEXT STEPS**

Immediately upon Board approval, distribute revised PTSC Investment Policy to external investment managers and broker-dealers. Issue copies of the Investment Policy and Financial Institutions Resolution to our financial institutions.

**ATTACHMENTS**

Attachments I: PTSC Investment Policy  
Attachment II: California Government Code: Section 16429.1 to 16429.4 and  
Section 53600 to 53609, Section 53652  
Attachments III: PTSC Financial Institutions Resolution

Prepared by: Donna R. Mills, Assistant Treasurer  
Marshall Liu, Senior Financial Analyst

A handwritten signature in black ink, appearing to read 'Terry Matsumoto', written over a horizontal line.

Terry Matsumoto  
Chief Financial Officer

*Public Transportation Services Corporation*

# INVESTMENT POLICY

Approved by the PTSC Board of Directors on September 8, 2005.

# INVESTMENT POLICY

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## 1.0 Policy

It is the policy of the Public Transportation Services Corporation (PTSC) to ensure that the temporarily idle funds of the agency are prudently invested to preserve capital and provide necessary liquidity, while maximizing earnings.

## 2.0 Scope

- 2.1 Investments may only be made as authorized by the California Government Code (“Code”) Section 53600 et seq., Sections 16429.1 through 16429.4 and this policy. This policy conforms to the Code as well as to customary standards of prudent investment management. Should the provisions of the Code become more restrictive than those contained herein, such provisions will be considered as immediately incorporated in this policy. Changes to the code which are less restrictive than this Policy may be adopted by the PTSC Board of Directors (Board).
- 2.2 This policy sets forth the PTSC’s guidelines for the investment of surplus General, Special Revenue, Capital Projects, Enterprise (excluding cash and investments with fiscal agents), Internal Service, Expendable Trust Funds, and any new fund created by the Board, unless specifically exempted. Excluded from this policy are guidelines for the investment of proceeds related to debt financings, defeased lease transactions, Agency (Deferred Compensation, 401K, and Benefit Assessment District) and Pension Trust Funds.
- 2.3 Internal and external portfolio managers may be governed by Portfolio Guidelines which on an individual basis may differ from the total fund guidelines outlined herein. The Chief Financial Officer is responsible for monitoring and ensuring that the total funds subject to this policy remain in compliance with this policy, and shall report to the Board regularly on compliance.

## 3.0 Investment Objectives

- 3.1 The primary objectives, in priority order, of the PTSC's investment activities shall be:
- A. Safety: Safety of principal is the foremost objective of the investment program. The PTSC’s investments shall be undertaken in a manner that seeks to ensure the preservation of capital in the overall portfolio. The PTSC shall seek to ensure that capital losses are avoided whether from institutional default, broker-dealer default, or erosion of market value. Diversification is required in order that potential losses on individual securities do not exceed the income generated from the remainder of the portfolio.
  - B. Liquidity: The PTSC's investment portfolio will remain sufficiently liquid to enable PTSC to meet all operating requirements that might be reasonably anticipated.
  - C. Yield: The PTSC shall manage its funds to maximize the return on investments consistent with the two objectives above, with the goal of exceeding the performance benchmarks (Section 12.0) over a market cycle (typically a three to five year period).
- 3.2 It is the PTSC’s policy to hold investments to maturity or until market value equals or exceeds (historical) cost. However, if the PTSC’s liquidity needs require that investments be sold at a

loss, or because of a downgrade of credit quality, national or public policy issues, or to take advantage of market conditions which will result in a gain on reinvestment of the sale proceeds, the security may be sold and the decline in value shall be recorded as a loss.

Internal and external investment managers shall report such losses to the Treasurer and Chief Financial Officer quarterly.

3.3 Investments shall be made with the judgment, skill, and diligence of a prudent investor acting in like capacity under circumstances then prevailing, for the sole benefit of the PTSC, and shall take into account the benefits of diversification in order to protect the PTSC's investment from the risk of substantial loss.

3.4 The standard of prudence to be used by investment officials shall be the "prudent investor" standard and shall be applied in the context of managing an overall portfolio. Investment officers acting in accordance with this investment policy, written portfolio guidelines and procedures and exercising due diligence shall be relieved of personal responsibility for an individual security's credit risk or market price changes, provided deviations from expectations are reported in the quarterly investment report to the Board, and appropriate action is taken to control adverse developments.

#### 4.0 Delegation of Authority

4.1 The Board shall be the trustee of funds received by the PTSC. In accordance with the California Government Code (CGC) Section 53607, the Board hereby delegates the authority to invest or reinvest the PTSC's funds, to sell or exchange securities so purchased and to deposit securities for safekeeping to the Chief Financial Officer for a one year period, who thereafter assumes full responsibility for such transactions and shall make a monthly report of those transactions to the Board. Subject to review by the Board, the Board may renew the delegation of authority each year.

4.2 The Chief Financial Officer shall establish written procedures for the operation of the investment program consistent with this investment policy, including establishment of appropriate written agreements with financial institutions. Such procedures shall include explicit delegation of authority to persons responsible for investment transactions. The Chief Financial Officer may engage independent investment managers to assist in the investment of the PTSC's financial assets.

4.3 No person may engage in an investment transaction except as provided under the terms of this policy and the procedures established by the Chief Financial Officer.

4.4 Officers and employees involved in the investment process shall be governed by the standards regarding ethical behavior and conflicts of interest established in the Los Angeles County Metropolitan Transportation Authority ("LACMTA") Ethics Policy and annually shall file a Statement of Economic Disclosure with the LACMTA's Ethics Office.



## 5.0 Permitted Investments

- 5.1 All PTSC funds which are not required for immediate cash expenditures shall be invested in income producing investments or accounts, in conformance with the provisions and restrictions of this investment policy as defined in Section 5.1A of this investment policy (Attached) and as specifically authorized by the California Government Code, (Sections 53600, et seq.).
- 5.2 In order to reduce overall portfolio risk, investments shall be diversified among security type, maturity, issuer and depository institutions. See Section 5.1A for specific concentration limits by type of investment. The following issue concentration limits shall apply:
- A. No more than 15% of the portfolio may be invested in any one Federal Agency or government-sponsored issue.
  - B. The obligations of a single corporation or depository institution shall not exceed 10% of the funds subject to this policy. In calculating this concentration limit, commercial paper, bankers' acceptances, medium term notes, asset-backed securities, and negotiable certificates of deposit shall be included; deposits collateralized per Section 7.3 of this policy are excluded from this calculation.
- 5.3 Maturities of individual investments shall be diversified to meet the following objectives:
- A. Investment maturities will be first and foremost determined by the PTSC's anticipated cash flow requirements.
  - B. No investment instrument shall be purchased which has an effective maturity of more than five years from the date of purchase, unless the instrument is specifically approved by the Board or is approved by the Board as part of an investment program and such approval must be granted no less than three months prior to the investment.
  - C. The average duration of the externally managed funds subject to this policy shall not exceed 150% of the benchmark duration. The weighted average duration of the internal portfolios shall not exceed three (3) years.
- 5.4 State and local government sponsored Investment Pools and money market mutual funds as authorized by this policy are subject to due diligence review prior to investing and on a continual basis as established in Section 5.1 A, #11 and #12.
- 5.5 This Investment Policy specifically prohibits the investment of any funds subject to this policy in the following securities:
- A. Derivative securities, defined as any security that derives its value from an underlying instrument, index, or formula, are prohibited. The derivative universe includes, but is not limited to, structured and range notes, securities that could result in zero interest accrual if held to maturity<sup>1</sup>, variable rate, floating rate or inverse floating rate investments,

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<sup>1</sup>California Debt and Investment Advisory Commission definition: Zero interest accrual means the security has the potential to realize zero interest depending upon the structure of the security. Zero coupon bonds

financial futures and options, and mortgage derived interest or principal only strips. Callable or putable securities with no other option features, securities with one interest rate step-up feature, and inflation-indexed securities meeting all other requirements of this Policy are excluded from this prohibition, as are fixed rate mortgage-backed securities and asset-backed securities.

B. Reverse repurchase agreements.

## **6.0 Selection of Depository Institutions, Investment Managers and Broker-Dealers**

6.1 To minimize the risk to PTSC's overall cash and investment portfolio, prudence and due diligence as outlined below shall be exercised with respect to the selection of Financial Institutions in which PTSC's funds are deposited or invested. The PTSC's Financial Advisor (FA) will conduct competitive processes to recommend providers of financial services including commercial banking, investment management, investment measurement and custody services.

A. In selecting Depositories pursuant to California Government Code (CGC) Sections 53600 (et seq.), the credit worthiness, financial stability, and financial history of the institution, as well as the cost and scope of services and interest rates offered shall be considered. No funds will be deposited in an institution unless that institution has been evaluated by a nationally recognized independent rating service as satisfactory or better. The PTSC's main depository institutions will be selected on a periodic and timely basis.

B. Deposits of \$100,000 or less which are insured pursuant to federal law by the Federal Deposit Insurance Corporation (FDIC), or the National Credit Union Administration (NCUA) may be excluded from the independent rating service evaluation requirement above and from the collateralization requirements of Section 7.3 of this policy, at the Chief Financial Officer's discretion. A written waiver of securitization shall be executed, provided to the Depository Institution, and kept on file in the Treasury Department.

C. The Chief Financial Officer shall seek opportunities to deposit PTSC funds with disadvantaged business enterprises, provided that those institutions have met the PTSC's requirements for safety and reliability and provide terms that are competitive with other institutions.

6.2 In selecting external investment managers and brokers, past performance, stability, financial strength, reputation, area of expertise, and willingness and ability to provide the highest investment return at the lowest cost to the PTSC within the parameters of this Investment Policy and the Code shall be considered. External investment managers must be registered with the Securities and Exchange Commission (SEC) under the Investment Advisor Act of 1940.

6.3 Pursuant to Code Section 53601.5, the PTSC and its investment managers shall only purchase statutorily authorized investments either from the issuer, from a broker-dealer licensed by the state, as defined in Section 25004 of the Corporations Code, from a member of a federally regulated securities exchange, a national or state-chartered bank, a federal or state association (as

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and similar investments that start at a level below the face value are legal because their value does increase.

defined by Section 5102 of the Financial Code), or from a brokerage firm designated as a primary government dealer by the Federal Reserve Bank.

- A. Internal investment manager will only purchase or sell securities from broker-dealers that are Primary Dealers in U.S. Government Securities or are a direct affiliate of a Primary Dealer, have returned a signed Receipt of Investment Policy and completed the Broker-Dealer Questionnaire, and have been approved by the Chief Financial Officer (see Appendices B and C). A current copy of the Broker-Dealer's financial statements will be kept on file in the Treasury Department.
- B. External investment managers may purchase or sell securities from non-Primary Dealers qualified under U.S. Securities and Exchange Commission Rule 15C3-1, the Uniform Net Capital Rule, and provided that the dealer is a certified member of the National Association of Securities Dealers. External investment managers shall submit to the PTSC, at least quarterly, a list of the non-Primary Dealers used during the period.
- C. External investment managers must certify in writing that they will purchase securities in compliance with this Investment Policy, PTSC Procedures, and applicable State and Federal laws.

6.4 Depositories, and external investment managers, who do business with the PTSC shall sign a Certification of Understanding. The Certification of Understanding (see Appendix A) states that the entity:

- A. Has read and is familiar with the PTSC's Investment Policy and Guidelines as well as applicable Federal and State Law;
- B. Meets the requirements as outlined in this Policy;
- C. Agrees to make every reasonable effort to protect the assets of the PTSC from loss;
- D. Agrees to notify the PTSC in writing of any potential conflicts of interest.

Completed certifications shall be filed in the Chief Financial Officer's Office. Failure to submit a Certification of Understanding shall result in the withdrawal of all funds held by that financial institution, or investment manager and/or the rescission of any and all authority to act as an agent to purchase or invest funds for the PTSC.

6.5 All broker-dealers who do business with the PTSC's internal investment managers shall sign a Receipt of Investment Policy. The Receipt of Investment Policy (see Appendix B) states that the broker-dealer:

- A. Has received, read, and understands the Policy;
- B. Has communicated the requirements of the Policy to all personnel who may select investment opportunities for presentation to PTSC.

Failure to submit a Receipt of Investment Policy shall preclude PTSC from purchasing or selling securities from such broker-dealer. Completed receipts shall be filed in the Chief Financial Officer's Office.

## **7.0 Custody and Safekeeping of Securities and PTSC Funds**

- 7.1 Securities and collateral for repurchase agreements shall be purchased and maintained for the benefit of the PTSC in the Trust Department or safekeeping department of a bank as established by a written third party safekeeping agreement between the PTSC and the bank. Specific collateralization levels are defined in Section 5.1A.
- 7.2 All investment transactions shall be settled "delivery vs. payment", with the exception of deposits, mutual fund investments, and Local Agency Investment Fund or other Local Government Investment Pools. Delivery may be physical, via a nationally recognized securities depository such as the Depository Trust Company, or through the Federal Reserve Book Entry system.
- 7.3 Funds deposited by the PTSC shall be secured by a Depository in compliance with the requirements of California Government Code Section 53652. Such collateralization shall be designated and agreed to in writing.
- 7.4 Original copies of negotiable certificates of deposit shall be held in a qualified safekeeping institution.

## **8.0 Reports and Communications**

- 8.1 The Chief Financial Officer is responsible for ensuring compliance with all applicable Local, State, and Federal laws governing the reporting of investments made with public funds. All investment portfolios will be monitored for compliance. Non-compliance issues will be included in the quarterly Board report as stated in Section 8.3 of this Policy.
- 8.2 The Chief Financial Officer shall annually submit a statement of investment policy to the Board for approval. The existing approved policy will remain in effect until the Board approves the recommended statement of investment policy.
- 8.3 The Chief Financial Officer shall render a quarterly cash, investment, and transaction report to the CEO and Board, and quarterly to the Internal Auditor within 30 days following the end of the quarter covered by the report. The report shall include a description of PTSC's funds, investments, or programs that are under the management of contracted parties, including lending programs. The report shall include as a minimum:
  - A. Portfolio Holdings by Type of Investment and Issuer
  - B. Maturity Schedule and Weighted Average Maturity (at market)
  - C. Weighted Average Yield to Maturity

- D. Return on Investments versus Performance Benchmarks on a quarterly basis
- E. Par, Book and Market Value of Portfolio for current and prior quarter-end
- F. Percentage of the portfolio represented by each investment category
- G. Total Interest Earned
- H. Total Interest Received
- I. A statement of compliance with this policy, or notations of non-compliance.
- J. At each calendar quarter-end a subsidiary ledger of investments will be submitted with the exception listed in 8.3J.
- K. For investments that have been placed in the Local Agency Investment Fund, in Federal Deposit Insurance Corporation-insured accounts in a bank or savings and loan association, in National Credit Union Administration insured accounts in a credit union, in a county investment pool, or in shares of beneficial interest issued by a diversified management company that invest in the securities and obligations as authorized by this Policy and the Code, the most recent statement received from these institutions may be used in lieu of the information required in 8.3I.
- L. At each calendar quarter-end the report shall include a statement of the ability to meet expenditure requirements for the next six months.

8.4 Internal and external investment managers shall monitor investments and market conditions and report on a regular and timely basis to the PTSC Chief Financial Officer.

- A. Internal and external investment managers shall submit monthly reports to the Chief Financial Officer, such reports to include all of the information referenced in Section 8.3, items A-J of this policy. Portfolios shall be marked-to-market monthly and the comparison between historical cost (or book value) and market value shall be reported as part of this monthly report.
- B. Internal and external investment managers shall monitor the ratings of all investments in their portfolios on a continuous basis and report all credit downgrades of portfolio securities to the Chief Financial Officer in writing within 24 hours of the event. If an existing investment's rating drops below the minimum allowed for new investments made pursuant to this policy, the investment manager shall also make a written recommendation to the Chief Financial Officer as to whether this security should be held or sold.
- C. External and internal Investment Managers shall immediately inform the Chief Financial Officer and Treasurer in writing of any major adverse market condition changes and/or major portfolio changes. The Chief Financial Officer shall immediately inform the Board in writing of any such changes.

- D. External investment managers shall notify the PTSC internal managers daily of all trades promptly, via fax.
- E. Internal investment managers will maintain a file of all trades.

## 9.0 Portfolio Guidelines

Portfolio Guidelines are the operating procedures used to implement the Investment Policy approved by the Board. The Chief Financial Officer may impose additional requirements or constraints within the parameters set by the Investment Policy.

## 10.0 Internal Control

- 10.1 The Chief Financial Officer shall establish a system of internal controls designed to prevent losses of public funds arising from fraud, employee or third party error, misrepresentation of third parties, unanticipated changes in financial markets, or imprudent actions by PTSC employees or agents. Such internal controls shall be approved by the Chief Financial Officer and shall include authorizations and procedures for investment transactions, custody/safekeeping transactions, opening and closing accounts, wire transfers, and clearly delineate reporting responsibilities.
- 10.2 Treasury personnel and PTSC officials with signature authority shall be bonded to protect against possible embezzlement and malfeasance, or at the option of the governing board self-insured.
- 10.3 Electronic transfer of funds shall be executed upon the authorization of two official signatories.
- 10.4 Transaction authority shall be separated from accounting and record keeping responsibilities.
- 10.5 All investment accounts shall be reconciled monthly with custodian reports and broker confirmations by a party that is independent of the investment management function. Discrepancies shall be brought to the attention of the investment manager, the Chief Financial Officer and Treasurer.
- 10.6 The Chief Financial Officer shall establish an annual process of independent review by an external auditor. This review will provide independent confirmation of compliance with policies and procedures.
- 10.7 The Chief Financial Officer is responsible for the preparation of the PTSC's cash flow model. The cash flow model shall be updated monthly based upon the PTSC's actual and projected cash flow.

Annually, the Chief Financial Officer shall notify the external investment managers of the PTSC's cash flow requirements for the next twelve months. The Chief Financial Officer shall monitor actual to maximum maturities within the parameters of this policy.

10.8 The Chief Financial Officer shall annually submit the Financial Institutions Resolution to the Board for approval. The existing resolution will remain in effect until the Board approves the recommended resolution.

**11.0 Purchasing Guidelines**

11.1 Investment managers shall purchase and sell securities at the price and execution that is most beneficial to the PTSC. The PTSC's liquidity requirements shall be analyzed and an interest rate analysis shall be conducted to determine the optimal investment maturities prior to requesting bids or offers. Investments shall be purchased and sold through a competitive bid/offer process. Bids/offers for securities of comparable maturity, credit and liquidity shall be received from at least three financial institutions, if possible.

11.2 Such competitive bids/offers shall be documented on the investment managers' trade documentation. Supporting documentation from the Wall Street Journal, Bloomberg or other financial information system shall be filed with the trade documentation as evidence of general market prices when the purchase or sale was effected.

**12.0 Benchmarks**

Internal and external investment managers' performance shall be evaluated against the following agreed upon benchmarks. If the investment manager does not meet its benchmark over a market cycle (3 to 5 years), the Chief Financial Officer shall determine and set forth in writing to the Board reasons why it is in the best interests of the PTSC to replace or retain the investment manager.

<u>Portfolio</u>	<u>Investment Benchmarks</u>
Intermediate Duration Portfolios	Merrill Lynch 1-3 year Government & Corporate Index
Short Duration Portfolios	Three month Treasury Bill

## SUMMARY OF AUTHORIZED INVESTMENT TYPES &amp; RESTRICTIONS \*

\* See California Government Code Section 53601 for further clarification with regard to securities permitted herein.

\*\* The percentage of portfolio authorized is based on market value.

#	Type of Investment	% of Portfolio Authorized **	Other Restrictions
1.	Bonds Issued by the Authority.	100%	Maximum effective maturity of five (5) years unless a longer maturity is approved by Board of Directors, either specifically or as part of an investment program, at least three (3) months prior to purchase.
2.	United States Treasury notes, bonds, bills or certificates of indebtedness or those for which the full faith and credit of the United States are pledged for the payment of principal and interest.	100%	Same as above
3.	Registered state warrants or treasury notes or bonds of the State of California.	25%	Same as above. Such obligations must be rated A1, SP-1 or equivalent or better short term; or Aa/AA or better long term, by a national rating agency.
4.	Bonds, notes, warrants, or other evidences of indebtedness of any local agency within the State of California.	25%	Same as above
5.	Obligations issued by banks for cooperatives, federal land banks, federal intermediate credit banks, the Federal Home Loan Banks, the Tennessee Valley Authority, or in obligations, participations or other instruments of or issued by, a federal agency or a United States Government-sponsored enterprise.	50%	No more than 15% of the portfolio may be invested in any one Federal Agency or government-sponsored issue.



## SUMMARY OF AUTHORIZED INVESTMENT TYPES &amp; RESTRICTIONS \*

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#	Type of Investment	% of Portfolio Authorized **	Other Restrictions
6.	Bill of exchanges or time drafts drawn on and accepted by a commercial bank, otherwise known as bankers acceptances of the highest letter and numerical rating as provided for by Moody's Investors Service, Inc., and Standard & Poor's Corporation.	40%	Purchases of bankers acceptances may not exceed 180 days maturity. No more than 10% of the portfolio may be invested in any one bank or corporate issuer.
7.	Commercial paper of "prime" quality of the highest ranking or of the highest letter and numerical rating as provided for by Moody's Investors Service, Inc., or Standard & Poor's Corporation. Eligible paper is further limited to issuing corporations that are organized and operating within the United States and having total assets in excess of five hundred million dollars (\$500,000,000) and having an "A" or higher rating for the issuer's debentures, other than commercial paper, if any, as provided for by Moody's Investors Service, Inc. or Standard & Poor's Corporation.	25%	Purchases of eligible commercial paper may not exceed 270 days maturity nor represent more than 10% of the outstanding paper of an issuing corporation.  No more than 10% of the portfolio may be invested in any one Corporate or bank issuer. If rated by more than one service, both ratings must meet the minimum criteria.
8.	Negotiable certificates of deposits issued by a nationally or state-chartered bank or a state or federal savings and loan association, a state or federal credit union, or by a state-licensed branch of a foreign bank. The legislative body of the local agency, the treasurer or other official of the local agency having custody of the money are prohibited from investing in negotiable certificates of deposit of a state or federal credit union if a member of the legislative body or any other specified city officer or employee also serves on the board of directors or certain committees of that credit union.	30%	Maximum maturity of five (5) years unless a longer maturity is approved by Board of Directors, either specifically or as part of an investment program, at least three (3) months prior to purchase. No more than 10% of the portfolio may be invested in any one bank name.

## SUMMARY OF AUTHORIZED INVESTMENT TYPES &amp; RESTRICTIONS \*

\* See California Government Code Section 53601 for further clarification with regard to securities permitted herein.

\*\* The percentage of portfolio authorized is based on market value.

#	Type of Investment	% of Portfolio Authorized **	Other Restrictions
9.	<p>Investments in repurchase agreements or securities lending agreement. The repurchase agreement must be covered by a master written agreement in the form of the current Public Securities Association agreement. The securities lending agreement must be covered by a Masters Securities Loan Agreement.</p> <p>Repurchase agreements and securities lending agreements shall be collateralized at all times. Collateral shall be limited to obligations of the United States and Federal Agencies with an initial margin of at least 102% of the value of the investment, and shall be in compliance if brought back up to 102% no later than the next business day. Collateral shall be delivered to a third party custodian in all cases. Collateral for term repurchase agreements shall be valued daily by the PTSC's investment manager (for internal funds) or external investment manager. Investments in repurchase agreements shall be in compliance if the value of the underlying securities is brought back up to 102% no later than the next business day. The Authority shall obtain a first lien and security interest in all collateral.</p>	20%	<p>See CA Government Code Section 53601, (i)</p> <p>Term of repurchase agreement cannot exceed 90 days.</p> <p>Repurchase agreements shall be executed through Primary Broker-Dealers.</p> <p>Reverse repurchase agreements are prohibited.</p>
10.	<p>Medium-term notes issued by corporations organized and operating within the United States, or by depository institutions licensed by the United States or any state and operating within the United States.</p>	30%	<p>Maximum five (5) year maturity. Notes must be rated "A" or its equivalent or better by a nationally recognized rating service.</p> <p>No more than 10% of the portfolio may be invested in one bank or corporate name. If rated by more than one rating service, both ratings must meet the minimum credit standards.</p>

**SUMMARY OF AUTHORIZED INVESTMENT TYPES & RESTRICTIONS \***

\* See California Government Code Section 53601 for further clarification with regard to securities permitted herein.

\*\* The percentage of portfolio authorized is based on market value.

#	Type of Investment	% of Portfolio Authorized **	Other Restrictions
11.	Shares of beneficial interest issued by diversified management companies investing in the securities and obligations as authorized, by California State Code 53601 and 53630 et seq.	20% maximum in any one or more money market fund, with no more than 10% of the total in any one bond mutual fund.	Companies must have either 1) the highest ranking or the highest letter and numerical rating provided by not less than two of the nationally recognized rating services, or (2) retained an investment advisor registered or exempt with the Securities and Exchange Commission, with no less than five years experience investing in A) Bond Funds: the securities and obligations authorized by State Code §53601 a-j inclusive and m or n; or B) Money Market Mutual Funds: money market mutual funds; both with assets under management in excess of five hundred million dollars (\$500,000,000). The purchase price may not include any commissions charged by these companies.

**SUMMARY OF AUTHORIZED INVESTMENT TYPES & RESTRICTIONS \***

\* See California Government Code Section 53601 for further clarification with regard to securities permitted herein.

\*\* The percentage of portfolio authorized is based on market value.

#	Type of Investment	% of Portfolio Authorized **	Other Restrictions
12.	State of California Local Agency Investment fund (LAIF) California Government Code Section 16429.1 through 16429.4, or other Local Government Investment Pools (LGIP) established by public California entities.		Maximum investment in individual Local Government Investment Pools limited to amounts permitted by California Government Code (CGC). Limit does not include funds required by law, ordinance, or statute to be invested in pool. Each pool must be evaluated and approved by the Chief Financial Officer, as to credit worthiness, security, and conformity to state and local laws. An evaluation should cover, but is not limited to establishing, a description of who may invest in the program, how often, what size deposit and withdrawal; the pool's eligible investment securities, obtaining a written statement of investment policy and objectives, a description of interest calculations and how it is distributed; how gains and losses are treated; a description of how the securities are safeguarded and how often the securities are priced and the program audited. A schedule for receiving statements and portfolio listings. A fee schedule, and when and how fees are assessed.

## SUMMARY OF AUTHORIZED INVESTMENT TYPES &amp; RESTRICTIONS \*

\* See California Government Code Section 53601 for further clarification with regard to securities permitted herein.

\*\* The percentage of portfolio authorized is based on market value.

#	Type of Investment	% of Portfolio Authorized **	Other Restrictions
13.	Asset-backed securities	15% combined with any mortgage-backed securities	Limited to senior class securities with effective maturities of no more than 5 years. Further limited to securities rated in a rating category of "AAA" and issued by an issuer having an "A" or higher rating for the issuer's debt as provided for by a nationally recognized rating service. Further limited to fixed rate, publicly offered, generic credit card and automobile receivables only. Deal size must be at least \$250 million, and tranche size must be at least \$25 million.

## SUMMARY OF AUTHORIZED INVESTMENT TYPES &amp; RESTRICTIONS \*

\* See California Government Code Section 53601 for further clarification with regard to securities permitted herein.

\*\* The percentage of portfolio authorized is based on market value.

#	Type of Investment	% of Portfolio Authorized **	Other Restrictions
14.	Mortgage-backed securities	15% combined with any asset-backed securities	<p>Pass-Through securities: Limited to Government Agency or Government Sponsored issuers, fixed rate, effective maturity of 5 years.</p> <p>CMOS: Limited to Government Agency or Government Sponsored Issuers "AAA" rated Planned Amortization Classes (PAC) only. The following are prohibited: ARMS, floaters, interest or principal (IOs, POs), Targeted Amortization Classes, companion, subordinated, collateral classes, or zero accrual structures.</p>

