

## The New Rules for Credit Rating Agencies: What Will They Mean for Arrangers of Structured Finance Products?

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The Securities and Exchange Commission (SEC or Commission) recently published two releases regarding rules for SEC-registered credit rating agencies or Nationally Recognized Statistical Rating Organizations (NRSROs). One release proposes additional, broader disclosure requirements for NRSROs and arrangers of structured finance products. Comments are due to the Commission on March 26, 2009. The other release adopts final rules that specify three new categories of prohibited conflicts of interest and impose additional recordkeeping and disclosure requirements. For more on these recent releases by the SEC, see our recent Email Alert.