PN-ABE-744

THE ROLE OF BUSINESS REGULATION

IN AN ERA OF

LIBERALIZED FINANCIAL MARKETS

February 23, 1990

Washington, D.C.

Report on the Proceedings

Washington, DC 20006

Price Waterhouse

April 5, 1990

Mr. Lance Marston
Bureau for Asia, Near East and Europe
Agency for International Development

Ms. Sandra Frydman
Bureau for Private Enterprise
Agency for International Development

Dear Mr. Marston and Ms. Frydman:

Re: Financial Sector Development Project
Contract No. PDC-2206-Z-00-8191-00
Seminar on Regulation

Attached please find copies of our Final Report on the proceedings of the February 23 seminar, "The Role of Business Regulation in an Era of Liberalized Financial Markets," as prepared by Price Waterhouse, Prime Contractor under FSDP.

It has been a pleasure to work with you on this activity. We look forward to working with you on this and other projects in the future.

Sincerely,

Mr. J. Richard Breen
Director, FSDP

Attachments

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I. SUMMARY

"The Role of Business Regulation in An Era of Liberalizing Financial Markets", a one-day workshop, was organized by the Private Enterprise Bureau (PRE) of the U.S. Agency for International Development on behalf of USAID's Asia, Near East and Europe Bureau (ANE). Its objective was to review developments in business regulation in an era in which rapid political and economic change are reshaping financial markets in the developing world, and to focus on USAID's role in meeting these challenges. The conference was held in Washington, D.C. on February 23, 1990, and brought together financial market experts and representatives from various A.I.D. departments in Washington.

The conference was divided into four presentations. The first, an overview of changes in global financial markets and the implications of those changes for A.I.D. programming, stressed the impact of liberalization, internationalization, institutionalization, innovation, and technology on financial markets. The global financial arena has become more complex and more competitive, and developing countries and A.I.D. must be able to operate in a more sophisticated financial environment. Those countries which modernize and reform their financial regulatory systems can benefit from global interdependence, but those who fail to do so may suffer from 'intervulnerability.'

The second presentation focussed on banking regulation in the U.S. and around the world. The U.S. bank regulation system was explored in detail, as was the current international framework for cooperation among bank examiners. There is a need for prudent bank regulation and supervision in every economy, and A.I.D. can assist developing countries through training courses and promotion of regional cooperation in bank supervision.

The third seminar was dedicated to capital market regulation and its impact on the mobilization of domestic risk capital. The American system was analyzed, and various suggestions were made for the establishment of securities regulatory agencies in developing countries. In addition, strong emphasis should be put on financial disclosure by all participants in the markets.

In the fourth and final presentation of the day panelists explored utility regulation and its implications for private provision of public services. The U.S. and British systems of utility regulation were explained, and suggestions were made as to how to proceed with regulation in the developing world. Panelists emphasized the unusual 'natural monopoly' characteristics of utilities, but stressed that there is still considerable room for competition and private enterprise in the provision of public services in the developing world.

Each presentation was followed by comments and discussion by panelists and guests, with particular emphasis on the role USAID can and should play in business regulation. Several broad issues which A.I.D. needs to address include the following:

- How can A.I.D. provide better data sets and information and methods of dissemination?
- How can A.I.D. learn to look at financial services in a systems context?
- How can A.I.D. address the need to staff and organize A.I.D. to respond to financial systems requirements in developing countries?
- Can good capital markets and banking regulation be effective in a marginal macroeconomic environment?
- What role can/should A.I.D. play in financial reform with regard to the IMF and the World Bank?
- Can (and should) A.I.D.'s traditional directed credit programs and relationships be restructured for local and international banking reform?
- Should A.I.D. accelerate the identification and/or development of expertise to provide technical assistance and training in banking regulation in developing countries?
- Do A.I.D. and the U.S. banking industry have a 'comparative advantage' in promoting reform of host country banking infrastructures? If so, in what areas?

II. PROCEEDINGS

Morning Session

Opening Remarks

In his opening remarks, **Lance Marston** of the Asia, Near East and Europe Bureau (ANE) welcomed about 40 guests to the workshop, held at the International Club on February 23. He said the essence of the regulation dilemma for AID is to eliminate the web of regulatory and policy constraints which stifle private sector initiative and creativity in the developing world. "We need to create a partnership between government and private enterprise," he said. As in the United States, there is a need for creative regulatory reform, he added.

"We are all involved in the open markets strategy. We need to find answers for competitive systems and economic revitalization, and we have a lot to learn about financial markets," Marston said. He added that ANE was hosting the conference for three reasons: to draw on the expertise of competent and experienced panelists; to identify the implications of market trends in the developing world; and to help develop program initiatives to promote economic revitalization.

Introduction

During his introduction and welcoming remarks, Financial Sector Development Project (FSDP) Project Manager **Dick Breen** of Price Waterhouse cautioned that while regulation had a justifiably bad reputation in the 1960s and 1970s, too little regulation can be a bad thing as well. "We have to remember that even with the trend toward private markets and free enterprise, there can still be negatives. Unrestricted competition can turn into unrestricted monopoly," he said.

Most countries in the developing world have experienced 'inappropriate regulation' over the past decades, with government determination of prices, production, allocation of credit, etc. "The goal now is to avoid the mistakes of the past and seek a compromise which will mesh economic efficiency and the public interest," he said. This conference is designed to give ANE Bureau an overview of business regulation in the United States, and to contribute information which can help AID meet its objectives for economic revitalization in the developing world, Breen said.

"<u>Imperatives of the '90s</u>"

In the morning's first program, **Robert Bench,** partner in charge of Price Waterhouse's Regulatory Advisory Services, spoke on "The Imperatives of the '90s," the forces of change driving global financial markets and their implications for AID programming.

The past 20 years have seen dramatic and even traumatic changes in world financial markets, changes which have affected both the developed and the developing worlds. There have been five key trends, he said: liberalization, internationalization, institutionalization, innovation and computerization. These developments have undone in 20 years the 60 years of business regulation which began with the Great Depression.

The first trend, liberalization, is illustrated by the gradual elimination of foreign exchange controls, interest rate ceilings, and credit allocation controls in much of the world, Bench said. In addition, a financial institution's role was much more clearly defined in the "old days": commercial banks, mortgage banks, brokers, underwriters, and savings and loans were distinct entities, with few overlapping functions. After the Second World War the United States Government sought to channel and control domestic capital flows, and international financial policy was mostly 'residual,' mainly through trade policy.

But gradual liberalization over the last two decades has led to greatly increased capital flows across borders. This trend toward internationalization of financial markets has its roots in several phenomena: the explosion of huge petrodollar surpluses in the wake of the oil shocks of the 1970s; the emergence of the Eurodollar market to absorb and redistribute the petrodollars; the expansion of large banks into international markets as they followed their clients around the world; and the need to capture capital flows for investment in developed countries and the developing world.

The third major trend, institutionalization, is linked to the growth of savings. As gross savings have grown around the world, savings institutions such as pension funds, insurance companies, and huge banks have come to dominate financial markets. Competing under more liberal rules, these powerful organizations have had to become more competitive, leading to the fourth trend, innovation. Financial institutions have had to innovate to compete, he said: they take aggressive positions, develop sophisticated products, and seek to grow at every opportunity. To succeed, they must innovate aggressively and grow.

Finally, there has been the communications revolution.

Telecommunications technology has revolutionized finance, obliterating old concepts of transaction time. There is now a 24 hour, global financial market, using computers, satellites, and instant telecommunications, he said. The result has been an enormous growth in the volume of financial transactions. "You've had this huge growth in transaction volume, but you don't need 2,000 clerks to keep track of it in the back room anymore; the computer can keep track of it all," Bench said.

There are many more options for the investor and the borrower today: one can use credit cards around the world, invest in West Germany or Malaysia through country funds, and get reports on the day's trading in Tokyo on the local evening news. The world financial system has become truly globalized.

Developing countries can take advantage of the new global financial interdependence, or they can be left out. Countries such as Hong Kong, Malaysia, and Indonesia have sought to "marry" themselves to the international financial system, and are able to reap the benefits of higher investment and lower interest rates. Nations such as Argentina and Brazil, on the other hand, have lost their international financial credibility, and suffer the "dark side" of interdependence, i.e. 'intervulnerability'. The results include capital flight, poor credit ratings and financial instability.

Beyond the interdependence issue, there is much more stress in the financial system: stress because of larger capital flows, increased competition, and strains on institutional and regulatory frameworks. The liberalized international financial environment and the new technology allow for enormous capital outflows when investors are unhappy with a situation. A classic example of this was the 1979 run on the U.S. dollar, after which Fed chairman Paul Volcker pushed up U.S. interest rates and the world entered the 1981-82 recession.

The blurring of distinctions between the traditional roles of financial institutions and regulators is putting great stress on the U.S. regulatory system, Bench said. "In the past the SEC, the Comptroller's Office, the FDIC, the Fed, and the other agencies had specific regulatory roles. Today we don't know who is in charge; activities don't fit in the traditional framework anymore. The agencies have to meet all the time, since they keep bumping into each other," he said.

But the situation is even more difficult in countries with weaker regulatory systems than the American one. Countries without a tradition of prudent regulation and oversight must address the 'Who's in charge?' issue because of the rapid growth in sophistication and interdependence in the financial markets, he said.

A key problem in developing countries is the lack of accurate financial and economic information. Such information is needed not only for regulation and supervision, but to help governments make economic policy as well. The IMF and the World Bank both stress the importance of accurate information, and are beginning to require better data as part of their conditions for structural adjustment loans. This information requirement thus becomes a key element of the modernization of regulatory and supervisory systems in the developing world.

"It is tough to modernize; we know there are a lot of sick financial institutions out there," Bench said. "But governments have to answer the question of whether they are going to rescue banks, whether they will protect depositors, or whether they will let banks fail."

More and more countries are coming the accept the World Bank's views on financial sector reform. Besides, if a country wants an international economic role it must have financial credibility. "The fact is, Brazil and Argentina don't have a financial navy out there. Countries need credible banks to get out there and generate the deals. If you don't reform your regulation and supervision, you just dig a deeper hole," he said.

There are tremendous benefits to be had for those who modernize and strengthen their financial regulation. Changes can be measured, and progress can be seen.

In his comments on Bench's presentation, former SEC commissioner **John Evans** said he believes the best regulation is full financial disclosure; financial institutions must reveal more information to the public. He said that he disagreed with banking regulations in many instances during his tenure at the SEC, but that he would explore that theme in his own talk later in the day.

Commentator **Michael Crosswell** of ANE/PD stressed the complexity and risk inherent in financial markets. There is uncertainty regarding the investor's claim as well as the risk of return, he said. Furthermore, there are huge transactions costs, so there is a need for powerful institutional arrangements.

There are several key issues for A.I.D. to address in this area, Crosswell said. First, how good are the financial institutions in Country X? And within that question, how appropriate are state of the art technology and methodology for the developing world?

Second, A.I.D. must look at the costs and benefits of becoming involved in business regulation; Bench's emphasis on increasing stress in the financial world implies that costs are rising, Crosswell said. He also noted that it is costly to change institutions and introduce modern methods, and that A.I.D. has to look at the costs and benefits of the present situation versus the possible. In addition, A.I.D. cannot simply pursue a greater volume of transactions; they must be economically sound and beneficial transactions. That is a tall order, he said.

Third, A.I.D. must remain aware of the tensions between regulation and competition. Developing countries need competition and economic stability in order to thrive, and A.I.D. might make a greater contribution in these areas than in regulation per se, Crosswell said. Market forces and financial institutions themselves can often do a better job at regulation than outsiders, he said.

In the question and answer session which followed the first presentation, the point was made that confidence in the financial system has become an issue in the United States as well as in developing countries. According to Bob Bench, the current savings and loan crisis is due in great part to the lack of competent regulation and supervision, as well as the moral hazard risk created by government guarantees through the FSLIC.

Addressing the same issue, John Evans again emphasized the importance of financial disclosure, and said the public can be counted on to make rational decisions. "The man on the street is smarter than we give him credit for," Evans said.

A question was raised about how to reconcile the political pressures at A.I.D. with the need to help strengthen financial sectors in the developing world. Bench said that the situation is different in each country, and that A.I.D.'s role should be modified accordingly. "The IMF and the World Bank are the chaperons. A.I.D. can fulfill a discreet advisory role to underpin the IMF and the World Bank," he said. Examples of such underpinning would be offering financial courses, setting up computer networks, and helping to design methods for the collection and distribution of accurate financial information.

Finally, the point was made that some rural financial systems may already operate efficiently in the developing world; from a cost/benefit perspective, would it still be best to modernize these systems? Bench said the best strategy might be to help modernize the more advanced of the developing countries first, and only later seek to modernize the truly undeveloped financial sectors.

Banking Regulation

In the second program of the morning session, **Robert Bench** spoke on banking regulation and its importance for the stability of the financial system.

Why regulate banks? Because banks hold public assets. Instability in the financial markets can lead to political instability, as illustrated by the Great Depression and the current savings and loan crisis. Politicians recognize the need for stable financial markets and banking systems, and by extension for banking regulation.

Bank regulation may take various forms. West Germany and France have highly centralized systems, while the U.S. system is more fragmented. There are nine federal banking agencies, plus state banking laws in the 50 states. There are 15,000 banks, 2,000 savings and loans, and 20,000 credit unions in the U.S.

Regulation is becoming even more relevant today because national governments are increasingly the lenders <u>and</u> investors of last resort. When a bank is about to fail, a government must decide whether the problem is one of liquidity or solvency. The former would require more lending to the bank, while the latter would require investing in or taking over the bank. The investor role is growing.

Bank failure can be disastrous for developing countries, as it can wreck development plans, cut capital flows, and jeopardize agreements with the IMF and the World Bank. Yet only now are many countries giving their governments the statutory base to regulate and supervise their banks. The basic needs of banking regulation are pretty much the same worldwide: consistent bank licensing requirements, government access to bank records, stronger government influence on bank policies and management, and more authority for regulators to "clean up" weak banks.

More prudential supervision is needed in developing countries, Bench said. It can be either preventive or curative, depending upon the situation.

The first type of preventive regulation is 'off-site,': banks sends reports--usually computer tapes--to the regulators. This is the "call system" of reports, and works very well in the U.S., though it was unfortunately not used for the savings and loans, Bench said. The system is being adopted around the world, and has the positive side effect of providing current and accurate financial information to the government.

'On-site' regulation means that government agencies are present at the bank. This system is well-established in the U.S. and Western Europe, and is growing in Asia. It is rather weak in Latin America, though, due in part to the expense of training and maintaining staff.

On-site bank examiners perform preventive supervision by ranking bank assets: assets may be considered "ok," "substandard," "doubtful," or "loss." The total of criticized assets is then calculated as a percentage of the bank's capital.

Similar calculations are performed on indicators such as assets, management, earnings, and liquidity. Combined, these provide the "CAMEL" ratio. An average score of '1' is ideal, while a score of '5' indicates a bankrupt bank. Ideally most banks will be in the 1-2 range.

For curative supervision, a weakened bank reaches an agreement with regulators to make changes to improve the bank's CAMEL ratio. Such agreements could include formal accords, civil or criminal penalties to change management, or cease and desist orders, he said.

There is a loose international network of bank regulators, centered on the Bank of International Settlements in Basle, Switzerland. The BIS seeks compatibility and consistency in banking regulations, and has done considerable "missionary" work in Europe, the Caribbean, Southeast Asia and the Persian Gulf area, seeking to rationalize regulations and promote international regulatory cooperation.

There is already a strong international framework in place for international cooperation in bank regulation; the question is money. Many developing countries do not have the resources to buy personal computers, train personnel, and travel to international conferences, he said. One area in which A.I.D. could make an important contribution would be promotion of regional cooperation and training in regulation and supervision.

The goals should continue to be compatibility and consistency. In the meantime, slow trends toward better securities regulation and more active supervision by bank's boards of directors could help improve the regulatory environment. External auditors are increasingly being asked to be responsible to governments when they encounter institutions in trouble, and countries such as Switzerland and Hong Kong are demanding greater disclosure by banks.

In his comments, **John Evans** again emphasized the importance of financial disclosure, and agreed with Bench that auditors should be responsible to governments when they encounter troubled banks. He ended by expressing his confidence in the general public, saying that "the public should be the moral suasion in the business world."

Thomas Rishoi of ANE/PD brought up several key questions regarding A.I.D.'s role in modernization and regulation. First, is a modern system actually necessary to meet AID/ANE goals? Second, if A.I.D. does become involved, what should its

objectives be? And what "comparative advantage" would A.I.D. have in this field, compared to entities such as the IMF and the World Bank, the IBRD, etc.?
There is also the question of the potential management burden on A.I.D., Rishoi said. The Agency does not have depth of experience in this area, and personnel resources are already stretched thin, he said.

Afternoon Session

Capital Market Regulation

In the first afternoon session, former SEC commissioner **John Evans** spoke on capital market regulation and its impact on the mobilization of domestic risk capital. He cautioned that deregulation is not a cure-all. "We can't afford to make the mistake that he who governs least governs best; there are big differences in regulation," he said.

Several basic facts must be borne in mind when considering regulation of capital markets: people have a strong desire to be rewarded for their work and sacrifice; people also want the freedom to make their own decisions; a system based on force will eventually fail; and there needs to be a moral restraint in capital markets, since there is a strong tendency to look out for one's own interests.

Economic growth requires investment. In order to save, one must believe that the future benefits of saving outweigh the immediate rewards of consumption. For this to occur, there must be confidence in the future, and a stable economic environment. And it is government's responsibility to provide this stability, particularly for equity and long-term securities.

The purpose of the securities market is to provide long-term capital for investment. The market allocates capital and provides a pricing mechanism. There is a need for current and accurate information, appropriate disclosure, and honest and qualified brokers.

Evans outlined some "do's and don'ts" of securities regulation, which follow:

There should be full financial disclosure at the initial offering of a security, and periodically thereafter. There should not be regulation of who may offer a security, nor of the price, nor of the timing of the offer; the market should make these decisions.

A single regulatory authority should be established, with securities market regulation its only mission. It needs to employ knowledgeable and honest people. Decisions needs to be decentralized, so they may be made at lower levels. And there should be an appeals process from agency actions.

This agency must prohibit regulators from profiting from their positions, as occurs is some countries. The agency itself must provide the specifics for regulation, rather than have them imposed by some other entity. Regulatory power and the right to confer and withdraw licenses must reside in the same agency.

Other government agencies must not have any role in judgement on securities matters, since this could be interpreted as government approval or interference. The regulatory agency must have the power to require financial information from any entity or individual involved in securities, and it must also have the right to prohibit participation by those who provide false or fraudulent information.

The securities regulatory agency should be independent, not government-run. The government should not be able to appoint directors, nor should the agency be a profit-maker. The private sector should be used a resource for recruitment and expertise.

The securities exchanges themselves should be composed of all qualified dealers, not just large ones. This would prevent the erection of anti-competitive "barriers to entry" such as high capital requirements, which would limit participation to the largest and most powerful firms.

Listings should be limited to one exchange. There should be guidelines for commissions, and surprise inspections of brokers. Regular reports should be required. The exchanges should be expected to enforce their own rules, and there should be strict requirements for 'adjusted net capital.' Stock manipulation must be prohibited. There must be immediate receipts for transactions, and transactions should be conducted in the order in which they are received.

Evans pointed to Indonesia as an example of good securities regulation, as that country has systematically allowed more market forces into the industry. He also praised A.I.D. for its low-key approach to securities regulation in Indonesia, Kenya and other countries. A.I.D.'s willingness to provide maximum flexibility in working with the host country with a minimum amount of restrictions has led to several very successful engagements, he said.

In his comments, **Gayle McGuigan, Jr.** of the IFC stressed the importance of government commitment to an organized market. There is a need for uniform accounting and disclosure rules, and the information must be available to the public, he said. The regulating agency will also have to address the inherent conflict of growth versus regulation.

The regulatory agency must be independent, beyond political expediency, McGuigan said; it must be an agency with teeth. "Experience has shown that without the demonstrated ability to use the stick, the carrot is absolutely useless," he said.

The market must be allowed to determine prices, McGuigan said; the government should not be involved. The impact of foreign investment must be considered in securities regulation. Finally, he added that flexible brokers commissions might be a good idea, and that insider trading is very difficult to control.

George Ferris of Ferris, Baker Watts, Inc. emphasized the reason for political interest in capital markets: capital markets mobilize capital for investment, which leads to jobs, which are of great interest to politicians, he said.

Ferris pointed out the importance of tax considerations in investment planning, and by extension in securities regulation. There must be fair regulation, and a strong secondary market for the trading of securities. The government should have a strong audit capability, and there should be a minimum of red tape in securities trading. USAID can make a significant contribution through financial education and regulatory promotion around the world, Ferris said.

Don Pressley of ANE/PSD acknowledged the importance of the U.S. regulatory system, but said that USAID is more interested in the developing countries, where markets are only now being created. He also expressed concern about USAID becoming involved in institutional work, and suggested that the Agency might do better by seeking to provide favorable economic climates in these countries than by becoming involved in regulation.

Utility Regulation

In the final presentation of the day, public utilities specialist **James Waddell** of Price Waterhouse spoke on utility regulation and its implications for the private provision of public services. Waddell listed several rationales for regulation of utilities: they are generally very unattractive investments in the developing world; there is political and social pressure to keep prices low; and there is a tendency toward 'natural monopoly' in the field, since the enormous capital investments required make genuine competition unlikely.

Waddell said there are three basic forms of utility regulation: regulation based on profit, on price, and on entry. He then explored in detail the regulatory and pricing frameworks in the United States and Great Britain, and concluded that while there is more room for competition in the power-generating side of the industry than previously thought, the distribution side will probably remain monopolistic, due to the nature of the business.

As to how utility regulation applies in the developing world, Waddell said there should be a "rational" system of regulation to assure investors an opportunity to recover costs and pay dividends. 'Natural monopoly' should be accepted, but efforts should be made to prevent monopoly abuses.

In his comments **George Hall** of Putnam, Hayes & Bartlett stressed the importance of more competition in the utilities field. In the U.S. there is more competition because of increasing consumer dissatisfaction with utilities; in the developing world consumers are unhappy with government ownership of utilities, and this has opened the field to private enterprise. Thus in both instances greater private participation in utilities creates a need for more regulation, he said.

Hall said that U.S. regulation of utilities is a "mess," but that there are alternatives, such as Great Britain's "light-handed regulation." But even that fairly simple system seems to be evolving toward the complex American framework, he said. At some point governments will simply have to face up to the natural monopoly aspect of utilities, and regulate according, Hall said.

Generally speaking, the best solution is to promote competition among utilities, Hall said. If that is impossible, governments should look at non-U.S. styles of regulation, and should by all means make firm rules. And regulators should understand that regulations have a price, he said: compliance with regulations will result in higher prices for the consumer.

Robert Archer of ANE/TR stressed the dilemmas which utilities pose for USAID in the developing world, particularly how USAID should treat utilities when governments will not offer sovereign guarantees to utility projects. This 'limited recourse finance' makes utility projects considerably more risky, and thus less attractive for investors.

APPENDICES

APPENDIX A: AGENDA

THE ROLE OF BUSINESS REGULATION IN AN ERA OF LIBERALIZED FINANCIAL MARKETS

AGENDA

8:30	OPENING REMARKS: *Lance Marston*
8:45	INTRODUCTION: *Dick Breen*
9:00-10:15	**IMPERATIVES OF THE 90s**: The forces of change driving global financial markets and their implications for A.I.D. programming Speaker: *Robert Bench*, former Deputy Comptroller of the Currency, Partner in charge of Price Waterhouse's Regulatory Advisory Services Commentators: *John Evans, Michael Crosswell (ANE/PD)*
10:15	COFFEE BREAK
10:30-11:45	TOPIC 1: **BANKING REGULATION**, and its importance for the stability of the financial system Speaker: *Robert Bench* Commentators: *John Evans, Thomas Rishoi (ANE/PD)*
12:00	LUNCH
1:30-2:45	TOPIC 2: **CAPITAL MARKET REGULATION**, and its impact on the mobilization of domestic risk capital Speaker: *John Evans*, securities markets specialist, former Commissioner of the Securities and Exchange Commission (SEC) Commentators: *George Ferris (Ferris, Baker Watts, Inc.), Gayle McGuigan, Jr. (IFC), Don Pressley (ANE/PSD)*
2:45	COFFEE BREAK
3:00-4:15	TOPIC: **UTILITY REGULATION**, and its implications for private provision of public services Speaker: *James Waddell*, specialist in public utility and financial economics and partner at Price Waterhouse in charge of domestic and international projects in the public utility industry Commentators: *George Hall (Putnam, Hayes & Bartlett), Robert Archer (ANE/TR)*
4:15-4:30	SUMMARY: *Dick Breen*

APPENDIX B: LIST OF PARTICIPANTS

THE ROLE OF BUSINESS REGULATION IN AN ERA OF LIBERALIZED FINANCIAL MARKETS

LIST OF PARTICIPANTS

Charles Aanenson	ANE/TR/HR
Timothy Alexander	PRE/H
Rafael Aguirre-Sacasa	Price Waterhouse
Robert Archer	ANE/TR
Robert Asselin	PRE/I
Jeanne Balcom	Price Waterhouse
Robert Bench	Price Waterhouse
Peter Benedict	ANE/MENA
Peter Bloom	AA/PSM
Dick Breen	Price Waterhouse
Mark Brown	Price Waterhouse
Terry Chuppe	SEC
Michael Crosswell	ANE/DP
James Dry	PRE/I
Deborah Dungan	Price Waterhouse
John Evans	Price Waterhouse
Judith Evans	PRE/I
George Ferris	Ferris, Baker Watts, Inc.
Barbara Friday	Price Waterhouse
Sandra Frydman	PRE/PD
George Hall	Putnam, Hayes & Bartlett
Brian Hannon	A/AID
Martin Hanratty	ANE/TR/ARD
Leonard Horwitz	Price Waterhouse
Robert Ichord	ANE/TR
William Jeffers	ANE/PD
Michael Jordan	ANE/TR/HPN
Linda Kelley	ANE/TR
Fred Kirschstein	PPC/PDPR/RP
Michael Kitay	GC/PRE
Mitzi Likar	ANE/SA
James Lowenthal	ANE/TR/ARD
Gayle McGuigan, Jr.	IFC
Raymond Malley	AFR/MDI
Lance Marston	ANE/PSD
Patricia Matheson	ANE/PD
Herbert Morris	GC/ANE
Robert Nachtrieb	ANE/PD
Michael Newman	PRE/PD
John Pielemeier	ANE/SA

B

Don Pressley	ANE/PSD
Susan Riley	ANE/PSD
August Rimpel	Price Waterhouse
Thomas Rishoi	ANE/PD
Karl Schwartz	ANE/DP
Meredith Scovill	ANE/DP
Donald Sillers	ANE/DP
James Sullivan	S&T/EY
Kiert Toh	ANE/DP
Michael Unger	PRE/CE
Gary Vaughan	ANE/PSD
James Vermillion	LAC/PSA
James Waddell	Price Waterhouse
Sean Walsh	PRE/H
Brian Wickland	ANE/PD
Graham Williams	OPIC