Below is a sampling of the detailed survey responses received from the aforementioned FCMs.

Question one:
With the complexity of fee schedules, regular modifications of fee rates and levels and reduced time windows to recapture fee adjustments, what challenges/roadblocks/investment needed to manage these fees have been created within the FCM to help monitor transaction fees?

First response to question one:
The complexities associated with fees can be pinpointed to the growing number of membership types across exchanges and their corresponding incentives. To manage this high-risk area, we've developed a team whose primary focus is brokerage, clearing and exchange fees. This team is a knowledge source for all fee-related concepts and is responsible for ensuring proper billing to our clients and payment to the exchanges where we do business.

Second response to question one:
Control-minded people are definitely needed to do the reconciliation function. They need to be connected with all other department within the firm. Also, this person must have an Information Technology (IT) based background who can manipulate data.

Third response to question one:
We have designed an online commission worksheet tool for sales management to use. The backbone is a price book which houses all exchange fees for the global exchanges. We designed the price book to catch misapplications and to ensure that fee schedules match the fees that are charged by the exchanges. The system also reconciles versus GMI fee schedules. Our client analytics team devotes 25 percent of one person's time towards monitoring fees, notifying sales of upcoming changes and updating the price book.

Fourth response to question one:
In order to better manage our fees, we have created several levels of control, some of which are automated. The biggest challenge in managing exchange and clearing fees are the additional levels of differentiation in fees the exchanges have devised. Discounts and "sales" have entered the futures environments and client investment performances can now be improved by the reduction of cost in exchange and clearing fees.

Our institutional clients have proven to be closer scrutinizers of the fees being charged both by the FCM as well as the exchanges. Indeed, the institutional clients are seeking greater profitability by trading on reduced fee markets, executing greater volumes electronically and using new exchange memberships to receive fee discounts.

Roadblocks have come from systems that have not kept up with the different levels of fees being charged by the exchanges. Additionally, the rapid introduction of hybrid (non-standard) products increased the need for technology development as well. System limitations have resulted in an increase in manual adjustments for rebates and surcharges. Investments are being made in the following areas:

- Controls to improve the reconciliation of the rates and fees
- Technology including more comprehensive programming from the systems providers as well as in-house programming
- Personnel to account for these various issues associated with fees

Fifth response to question one:
We use several different pieces of software to load trades into our GMI back office system. We use GMI and another software consulting firm as a pre-processor to many of our trades. The two data paths can produce inconsistent results in our final GMI transaction file.

Additionally, like every other FCMs, our customers use a multitude of electronic front-end systems. There are inconsistencies across these platforms as to how data is eventually loaded into GMI.

We run in three completely segregated GMI environments. Not simply different firms, but completely different sets of files and files libraries. We are not consistent with how we load trades across these environments. For example, in what we call our "Local's environment," we do not use the GMI multiple broker table to determine a trade's CTI, instead relying on whatever the front end has been coded to send to us.

One major hurdle is the inconsistent methods used to keep the "clearing ID" associated with a trade. Trades elected on the TOPS platform, for example, are downloaded first into GMI and the extracted and sent to clearing by GMI. We do not have a method in place to associate the clearing ID with our GMI trade. We assume at some point we will receive a TREX (and soon to be FIXML) message back with that information, but we do not load it.

Account allocations are a substantial issue. Depending on the method we use, the account allocation might not flow to the Clearing House and therefore we have an 'out trade' between EFS and GMI because of the account change.

Omni regeneration accounts pose a problem in that the individual accounts enter trades throughout the day, but they all regenerate into a single omnibus account at night. Some of these may have differing membership statuses and therefore different rates on EFS. Often those differences are lost in our system at night when they are all regenerated into one account.

We have spent a fairly substantial amount of effort on these situations in creating a fee reconciliation system. We are currently running version 1.0.0 which was not very sophisticated. We are on the verge, however, of implementing version 2.0.0, which promises to be much more helpful in identifying many of the situations mentioned above.

We have many times asked GMI to either allow "fees by product group" or give us the ability to copy a fee rate from one contract to another. For example, if the entire currency quadrant changes its rates, we must go into GMI and change every fee at the futures code level. It would be much easier if we could simply make a single change to a "currency quadrant" level record and be done with it.

Sixth response to question one:
The challenges are obviously reconciling what the exchanges charge versus what you charge your customer. Fees direct from Rolfe & Nolan is a product that we've started to use, first, as a one-stop shopping outlet where we can get accurate world wide fees. Down the road, we have other plans to incorporate it more into our processing.

Seventh response to question one:
We are in the process of developing a new proprietary system for trade capture, reconciliation and fee identification. This is the only way as volumes continue to grow on global exchanges. As part of this initiative, a robust fee database will be put in place to capture fees globally and a reconciliation tool will be developed to accurately reconcile internal data to exchange fee systems. However, given the complexity of fee schedules, a "one system fits all" is very difficult to develop, and continuous monitoring of exchange fee changes is required. Fee schedules globally can differ greatly, as markets in Asia have different fee methodologies than those in Europe and North America. While the majority is on a per contract basis, fee calculations on a percentage of market value, percentage of trading value can be difficult to capture and monitor.

As more sophisticated customers continue to enter futures markets, greater communication is needed across all areas of the organization to ensure fee information is processed accurately. Better communication is also required from exchanges regarding member versus non-member rates, and better communication is required from exchanges regarding sophisticated customer who attain certain membership requirements and benefits at applicable exchanges.

Many responses we have received to this question have dealt with FCMs investing time and resources in implementing fee management tools that update and verify global transaction fees schedules within the FCM.

Listed below are the independent fee data information providers mentioned in the responses and a cursory overview of their product and service provided (source information for each provider was taken from marketing materials on each provider's website)

Fees Direct from Rolfe & Nolan. Fees Direct is designed to address a direct response to the industry's pressing needs for automated, accurate and concise information, with appropriate levels of security and control, regarding transaction fees. Fees Direct was created to meet the needs of the front, middle and back office, as well as internal and external auditors. Fees Direct is populated with over 480,000 transaction fees. For more information regarding Fees Direct, visit www.rolfeandnolan.com/newproducts.

Trading Fees Databank ("Databank") from the Institute of Financial Markets (IFM). Databank is a low-cost industry-driven solution to a common problem, complexity of transaction fees, and is designed to be an industry utility. The Databank provides trading and clearing operations with a transparent means of collecting, interpreting and monitoring the complex fees associated with trading on global exchanges. More importantly, the Databank helps FCMs save staff time, reduce errors and lower operational expenses significantly. The Databank collects, validates and continuously monitors transaction fees on more than 71 global futures and options exchanges. For more information regarding Trading Fees Databank, visit www.theifm.org.

TRADEfees from Futures and Options World TRADEdata. TRADEfees service provides busy professionals in futures and options trading complete transparency of the costs to trade on derivatives exchanges worldwide. TRADEfees can easily be integrated into back office systems, account reconciliation programs and other decision-support applications. TRADEfees covers approximately 75 global derivative Exchanges, over 30,000 contracts covered and over one million individual fees stored. For more information regarding TRADEfees, visit www1.fowtradedata.com.

Question two:
With the onset of electronic trading and straight through processing (STP), has a FCM's ability to control transaction fees been enhanced or hindered? Give examples and/or explanations for either.

First response to question two:
In most instances, the onset of electronic trading and STP has hindered the FCM's ability to control transaction fees. As a result of electronic trading, we are constantly playing catch up at the exchanges with our client electronic trading IDs. Unfortunately, these can be setup without our knowledge and our first tip off is usually the client complaining that their account is not charging properly without any regard for the fact that even though they launched a new trading ID at the exchange.

We are required to manually register such ID in the billing system in order for them to receive the preferential fee reductions they may be entitled to. With STP, we are not always aware of new accounts clearing the exchange, which ultimately clear in an omnibus account of a client or affiliate. Again it causes a fee miscalculation where we are paying non-member fees to the exchange, while affording the client the benefit of member fees in their omnibus account.

Second response to question two:
The onset of electronic trading and STP has hindered the FCM's ability to control transaction fees. One of the issues is that some exchanges require registration of electronic traders. Often, this data isn't included in the file that comes back into the internal processing system (GMI). So we have no way of knowing which operator executed the trades, and therefore don't know which fees we should charge. However, it's doubtful that the system could even charge the correct fees even if the operator ID came through correctly. Most systems are designed to handle fees at an account level, not at an operator ID level.

We also need clear indicators on the trades that match the exchanges' fee schedules and all methods of trading. In addition, we always need to know who entered the trade, the client or the FCM. This is a major issue on ICE and NYMEX, where we have clients self-executing and executing with a firm sales desk, the exchange is not sending that information. So we have no way of accurately charging the client. We either overcharge them on everything or undercharge them.

Third response to question two:

Electronic trading and straight through processing has hindered and enhanced the FCM's ability to control transaction fees. The volume increase seen as a result of electronic trading and straight-through processing has been tremendous. Along with the volume are new codes for the one-off trade types, such as EFP or new membership designations, allowing client discounts. Where fee changes have the ability to be automated, the FCM's ability to control them is enhanced.

Hindering the FCM is the amount and rapidity of the fee changes and/or waivers where programming has been insufficient. Additionally, electronic trading has made trade origination identification more vital with systems programming running all out to catch back up with the needed automation. Exchanges such as Kansas City, Sydney and Singapore with order origin fee differences (phone vs. electronic) have made those ID captures more essential.

Fourth response to question two:

The ability to control transaction fees has been hindered, due to sophisticated traders being charged a small commission plus fees. Clients used to be charged one rate that encompassed fees, if there were a mistake with programming fees we could adjust on the fee system side and still be whole on the account side. Now if fees are wrong, it is difficult to go back to a client and ask to be reimbursed.

The exchanges know that due to straight-through processing, most clients are paying their own fees and therefore target clients with fee incentives. Although these incentives generate volume, it puts the burden on the FCM to maintain and pass the incentive to the account. However; the notion of STP reverts to manual processing when APS and allocations are introduced.

Fifth response to question two:

Theoretically, the FCM's ability to control transaction fees should be enhanced as it should be easy to identify on which platform a trade was executed. However, this is not the case. IT involvement is required to ensure that all mapping is in place and this can be time consuming. Exchanges are not always transparent in what flags they are exporting to identify these differing platforms. Below are two example issues:

- NYMEX has never categorically said that Access no longer exists and which platform replaced it. Therefore, we still have Access flags being generated in Rolfe & Nolan in error. Are these products now traded in the Pit /Globex/Clearport Cleared or all three?

- ICE Futures US electronic flag has still not been mapped in Rolfe & Nolan due to the way in which the flag is exported from the Exchange. IT still has this as an open issue.

Sixth response to question two:

We are hindered by the exchange's direct contact with our clients. We, in fees, are often 'the last to know' about a change to an account's membership status.

In the above scenario, the exchanges can calculate fees and place the fee amount on each trade as they are sent to the FCM. The FCM could then charge the client the fee calculated by the exchange. This would alleviate substantial fee reconciliation cost at month-end. Also, the onset of electronic trading has brought with it a substantial increase in fee rebates and incentive programs that cannot be handled by our back office system.

Seventh response to question two:

Outside of the need to manage additional sets of fees for the various trading platforms, the elimination of pit-broker manipulation of trades has enhanced our ability to identify trade types, accounts, etc., and charge our clients correctly.

Eighth response to question two:
Electronic trading has hindered our ability to control transaction fees. Electronic trading has resulted in increased volumes across all exchanges, thus putting capacity limitations on existing processing systems resulting in frequent system outages. While we currently have a proprietary system to book listed derivatives, increased volumes have put additional pressure on Operations to clear trades and resolve breaks.

Question three:
What new processes within your FCM have been instituted to monitor transaction fees? Expound on the process or processes.

First response to question three:
We have instituted a tier-based approach to reconciliations. With time constraints as is, this is the most efficient way to reconcile transaction fees.

Second response to question three:
We have created some fairly sophisticated fee reconciliation systems and continue to improve on them.

Third response to question three:
By teaming with IFM as a reference tool, we are able to more clearly interpret exchange website fee schedules and reconcile appropriately to our exchange payments and client bills.

Fourth response to question three:
Some of the new processes our FCM has put in place to monitor transaction fees are input source verification and exception reviews.

Fifth response to question three:
We have implemented a procedure to ensure full capture on fee changes. We use information from multiple input sources to keep informed of changes in exchange and clearing fees. If sources are not in agreement, we approach our sources for clarification and/or amendments. This is particularly important where the exchange fee change notice is not clear or is, as we have seen in some cases, incorrect.

Sixth response to question three:
We have established exception reports for fees not set in the systems as well as verification controls to ensure accuracy of input and that the theory supporting the change is sound.

Seventh response to question three:
To date, one person has been responsible for monitoring global transaction fees. This is set to change, but in the past, the ways of learning about fee changes have been notices sent directly from the exchange (when this does happen), reading Industry informational reports such as John Lothian's newsletter and being a member of the IFM, a valuable source of information. The whole process is manual.

Eighth response to question three:

As it has become increasingly difficult to monitor global transaction fees from many of the exchanges on which we trade, we have found it increasingly beneficial to utilize the IFM fee schedules and daily notifications.

Ninth response to question three:
We have a commission and fee department that manages the GMI/Account Level transaction fees process. We have within the accounting department a group that manages the exchange billings versus what was charged at the client account level. We have built a process in which the exchange data is compared to account level charges and differences are investigated. This is a monthly process to comply with exchange timeframes to submit adjustments.

Tenth response to question three:
While a new Proprietary system is in development, until such system is in place, the monitoring of transaction fees can be manual in nature. However, access has be requested of various exchanges to their electronic fee systems, and controls are in process of being introduced which would separate the functions for registered accounts for applicable discounts and member rates, and the actual reconciliation function. Access to electronic fee systems is being obtained to monitor fees on a daily basis which will allow for errors to be discovered quicker and fixed in a timely manner.

Greater communication is also in place with individual departments monitoring exchange websites for information and communicating that information to the appropriate parties. As part of the on boarding process, more information is being obtained from customers to ensure fee information will be coded correctly to ensure accurate calculations. More dialogue also takes place between the FCM and the various exchange member hotline to ensure a full understanding of the fees charged and the systems used by the exchanges.

Question four:
What is your top five list of on-going transaction fee issues? Expound on the issues and what fixes would be needed to alleviate them?

First response to question four:
1. We have to manually adjust back members for exercise, assignment and expiration fees.
2. The tiering volume discounts and fee capping.
3. The fee discounts offered based on data that the FCM cannot possibly capture (terminal ID).
4. The frequency of fee changes on existing products.
5. The application of member/non-member fees across allocations.

Second response to question four:
1. Accurate charging of what we are being charged versus what we charge the customer, we are constantly spot checking of fees.
2. The changing/waiving/adding of fees, we have begun to use Fees Direct as our source of accurate fees.

Working with traders and the ISVs to set up their operator IDs, Tag 50's and accounts for accurate accounting at the exchanges.

Third response to question four:

1. There are time constraints when reconciling transaction fees when you have other responsibilities.
2. We would like an automated reconciliation tool to help in the reconciliation process.
3. The moves/adds/changes greatly hinder the reconciliation process due to timing issues.
4. There is continuous registration of IDs and Tag 50s that hinder charging proper transaction fees.

Fourth response to question four:

1. The inability of our bookkeeping system to allow for product complex set up for transaction fees.
2. The data entry required for the change to one product complex costs can sometimes require a change to hundreds of records.
3. GMI needs enhancements so that the transaction fees can be coded at the product complex level, rather than the current individual product level.

Fifth response to question four:

1. The GMI system's inability to keep pace with incentive programs is a problem.
2. A lack of daily and month-end reports from EFS and Dashboard to support all of their incentive programs.
3. The GMI system's laborious method of maintaining transaction fees and membership types.
4. The lack of an interface between the EFS and GMI to automatically download fee rates into GMI.
5. Dashboard and EFS systems response time around month end.

Sixth response to question four:

1. The continual updates to costs put out by the Exchanges are becoming onerous. The number of incentive programs and rules governing each are cumbersome and not easily managed. It would be preferable to have the costs reduced outright, rather than the rebates which are now required. Or better yet rebates could be passed directly from the Exchange to the member, removing the FCM from the process completely.

2. The changes to membership structure, due to mergers, etc., are another issue. We believe some would say it requires an attorney just to read an exchange fee schedule and determine where exactly your particular account fits in.

3. The bookkeeping systems need serious enhancements in order to properly read the transaction type codes sent by the exchange, and more importantly once read, to allow fee setups that will populate automatically for the various new transaction types. Some examples of struggles in the past for us have been block trades, EFRs, Swaps, etc.

4. Limitation in bookkeeping systems regarding membership coding for accounts is another issue that needs to be looked at. Today, for example, at the CBOT, a proprietary member account can be feed in at least three different ways depending on who has executed the trade. Our solution to this issue has been to one-off code these accounts for specific fee rates based on executing broker, but this again can require numerous setups for one account in order to cover all the different products traded and different divisions of membership applied to the account based on the broker. It is a setup for disaster if updates are performed on the numerous one-off setups that are being required to charge the proper fee to each account.

Seventh response to question four:

1. The transaction fees that are not fixed figures but are formulae usually based upon the contract value. An indication on the IFM fee schedule to indicate the percentage instead of a multi-decimal number, and a sample of the formula, would be of value.

2. The knowledge of all transaction fees that are waived and the information updated in a timely manner. The comment section at the top of each exchange's sheet should always be updated. In addition, perhaps one document could summarize all of the waivers.

3. Simplification. The complexity of transaction fees charged i.e., "exceptions" causes set up issues and in some cases can require technology development (i.e. CBOT volume discount).

Eighth response to question four:

1. The desire for a pull detailed fees from each exchange. There is some development with private vendors in this area, but little standardization from exchanges. We would like a direct pull available from each exchange in an agreed format.

2. Identifying the execution path from client to clearing broker can be murky on different exchanges and different front ends. Programming specialized setups would be easier if there were some standardization in this portion of the industry.

3. The availability of clearly defined membership listing from each Exchange. This listing would be two fold and show reference to CTI codes, requirements in obtaining the membership and a complete definition of each membership type, as well as a list of clients who are registered for each membership type.

4. Manual intervention with volume based rebates or surcharges on specialized products or types of products. These rebates require manual input into firms systems and can be time consuming and lend themselves to input errors.

5. The interpretation of each fee change notice. As each exchange amends its fee schedule more regularly, identifying the contract, member type and amount of each change has become the challenge. Vague notices cover the exchange and leave the FCM scratching their head. Contacting sources, such as the IFM or the Exchange, for clarification can cost time and efficiency.

Ninth response to question four:

1. Complexity of transaction fee schedules, it is hard for a person to interpret, let alone a bookkeeping system.

2. Registration of user ID's, time consuming and full time job, this should be account driven only.

3. Exercise, assignment and delivery rebate, very time consuming. The clearing house knows what origin is used and should be appropriately priced.

4. Communication of membership status/changes. Memberships are constantly being changed and there needs to be a better way of communicating this. The exchanges do not notify FCM of client memberships; therefore, unless a client notifies the FCM there will be fee adjustment issues.

5. Time table for recapture of fee discrepancies. This should be the same time frame (12 months) as fee audits by the exchanges.

Tenth response to question four:

1. Exchanges making changes without distributing fee circulars or notices.

2. Notice given of pending changes. Transaction fees set up in systems such as Rolfe & Nolan and GMI is still a very manual process. Fee maintenance staff need as much notice as possible of any upcoming changes in order for preparation work to take place and for information to be distributed. This is so that further downstream systems can be updated in a timely manner and that clients can be made aware of fee changes that they may see on their statements. Sending a notice the day before, on the day or even after the event puts an incredible amount of pressure of fee maintenance staff to ensure that all are accurately coded and thus avoid reconciliation breaks and upsetting clients.

3. Ever increasing execution platforms without a support network in place for ensuring downstream systems can flag and thus drive the differing associated transaction fees.

4. Monthly banded structures and other such structures that differ from the regular rates. Do the Exchanges ever consult users of Rolfe & Nolan and GMI to be sure that these can be accurately mirrored?

5. Monthly posting of fees. It would be easier to reconcile if fees were posted daily.

Eleventh response to question four:

1. Bilateral/trilateral fees e.g., NYMEX instruments offered input, on GLOBEX, and via Clearport. It is very difficult for internal systems to correctly identify how a product was executed and then to apply different rate sets. Can exchanges make the fees the same across all platforms?

2. The data quality from the exchanges. Some routing details are on the initial trade are lost when the trade comes into the processing system, e.g., operator IDs on electronic trades are missing when they get into GMI.

3. Sliding scales are difficult to implement into processing systems, e.g., CME end-of-month calculation based on average daily volumes. It's impossible for any system to account for these fees, so we're forced to charge average rates with the hope that it evens out in the end. If sliding scales are that attractive, then make them on a per-trade basis, which most systems can handle.

4. NYMEX fees. The exchange website is difficult to navigate, and the exchange fees are not reported in enough detail. The most helpful tool on NYMEX is the commodity summary, which is distributed monthly, but only to people on the distribution list. Customer service is not very helpful and only one person on the team is very knowledgeable about fees.

5. Memberships. Corresponding transaction fee schedules on North American Exchanges (CME, CBT) have become so complex that knowing exactly who executed the trade makes a big difference in transaction fees.

6. European single stocks and indices. It is very difficult to tell which country the indices are from (Eurex, Euronext.Liffe, MONEP, BSX, and BVLP). Transaction fees are charged on the base currency, but the contracts' trade prices are in Euros. It would be a lot simpler to keep the fees and caps (for block trades) consistent across the different country groupings.

Twelfth response to question four:

1. Understanding the discounts available from the respective exchanges. Certain fee schedules can be quite complex and ambiguous. It has been noted by the CME that the rules in relation to the Unregistered Operator ID are difficult to understand and implement, with many firms in the industry struggling to implement these rules. There should be more input by the exchange as to the interpretation of the rules, and a greater appeal process for members to reclaim erroneous rates (instead of the current two month limit, rebates should be submitted for six months).

2. Fee schedule for the NYMEX can be ambiguous. We have noted that when we call the exchange for explanation of the fee schedules, the schedule can actually be outdated regarding certain fees (e.g. Fees for Liquidity providers for OTC Clearport transactions). Also, the fee schedule for the NYMEX does not provide clarity regarding the range of products traded and which products the actual fee would apply to. This is critical since there is a wide disparity in the fees charged, both on a per product basis, as well as member versus non-member rate. Furthermore, the complexity of products and trading capability now on offer by the various energy related exchanges (NYMEX Clearport, ICE OTC, etc.) can be complex and difficult to understanding given the various rates applicable to different sectors (electricity products are complex in nature and the fees associated with these products equally complex). While the ICE OTC market continues to reduce fees, verifying the fee rate/products against internal systems is quiet difficult, which results in additional resources needed to monitor and reconcile fee data.

3. The various membership rules and fee rates in place by the various exchanges can be complex and difficult to monitor. While the exchange lets this up to the individual members, these membership types may require more detailed explanation. Furthermore, the exchange should provide more frequent updates to member firms in the event of changes to membership (when new members are added, especially inactive clearing members, 106H/N members etc on the CME, and pools, hedge funds etc on the CBOT. Additionally, changes or new schedules should only be introduced at set timeframes, so FCMs know when to expect and can better control.

4. On European exchanges, identifying trading via B-Clear as opposed to regular LIFFE trading is difficult. Furthermore, B-Clear provides cheaper transaction related costs; however, the number of CAPS in place depending on the product traded is difficult to implement and monitor, and reliance has to be placed on the exchange that the fees charged are accurate. Furthermore, Eurex fee structure is also quiet complex, especially the rules surrounding Block trades and other OTC trades on the exchange. Again, the identification of what type of trade was conducted (Flex Options, OTC, Volatility trades etc) can be difficult to identify by our internal systems. Exchanges appear to be providing additional ways to trade and clear products and charge additional fees, however, it appears that no though has been given as to how FCM capture, differentiate, and monitor these products internally.

5. In general, while some exchanges provide detailed billing information, all exchanges should strive to provide a detailed breakdown of fee information based on customer account. Currently, the LCH bill only provides a breakdown by fee type and product traded, there is no breakdown by individual customer account. This is also true for the Singapore exchange and the ICE U.S. The individual exchanges have the fee information per customer and should be made more readily available to members in order to reconcile to internal data to ensure accuracy.

6. Exchange systems should accept feeds from the FCMs with Firm versus customer and member versus non-member indicators, eliminating the need to manually update. Further, the exchange systems should allow the FCM to send a trade file and process the volume discounts, incentive rebates and fee calculation (perform reconciliation, identify exceptions (highlight account discrepancies, show trades not processed etc.) and calculate fees/rebates. This would create a standardized process across the industry and automatically apply any new rates that the exchange provides.

7. Exchange system should identify only new accounts that are required to be registered as opposed to having to review every account each month.

8. The adjustment window periods should be expanded. If the exchanges do not feel this is viable, then they should default to the member rates.