

#	Task / Milestone	Resources*	2012												2013												2014											
			J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
Plan for Support of New and Existing Client Account Rules																																						
1	Review and Analysis of FATCA Notices	BA	[Gantt bar]																																			
2	Proposed FATCA Regulations Released		[Milestone diamond]																																			
3	Review and Analysis of Proposed Regulations	BA	[Gantt bar]																																			
4	Perform Gap Analysis on Systems based on Proposed Regulations	BA	[Gantt bar]																																			
5	Development of Business Requirements	BA	[Gantt bar]																																			
6	Development of Functional Requirements	BA	[Gantt bar]																																			
7	Conduct General System Design (complete as much prior to Final Regs)	IT	[Gantt bar]																																			
8	Final FATCA Regulations and Model Agreements Released		[Milestone diamond]																																			
9	Review and Analysis of Final Regulations	BA	[Gantt bar]																																			
10	Update of Business Requirements per Final Regulations	BA	[Gantt bar]																																			
11	Update of Functional Requirements per Final Regulations	BA	[Gantt bar]																																			
12	Update General System Design per Final Regulations	IT	[Gantt bar]																																			
13	Conduct Technical System Design	IT	[Gantt bar]																																			
14	Coding and Build	IT	[Gantt bar]																																			
15	Testing	BA, IT	[Gantt bar]																																			
16	Internal User Training & External Client Education	BA	[Gantt bar]																																			
17	Production Release - Customer Due Diligence Functionality		[Milestone diamond]																																			
Plan for Support of Withholding Rules																																						
18	Review and Analysis of FATCA Notices	BA	[Gantt bar]																																			
19	Proposed FATCA Regulations Released		[Milestone diamond]																																			
20	Review and Analysis of Proposed Regulations	BA	[Gantt bar]																																			
21	Final FATCA Regulations and Model Agreements Released		[Milestone diamond]																																			
22	Perform Gap Analysis on Systems based on Final Regulations	BA	[Gantt bar]																																			
23	Review and Analysis of Final Regulations	BA	[Gantt bar]																																			
24	Development of Business Requirements	BA	[Gantt bar]																																			
25	Development of Functional Requirements	BA	[Gantt bar]																																			
26	Conduct General System Design	IT	[Gantt bar]																																			
27	Conduct Technical System Design	IT	[Gantt bar]																																			
28	Coding and Build	IT	[Gantt bar]																																			
29	Testing	BA, IT	[Gantt bar]																																			
30	Internal User Training & External Client Education	BA	[Gantt bar]																																			
31	Reports due for 2013 (name, address, TIN, Acct #, Acct Balance)		[Milestone diamond]																																			
32	Production Release - Withholding Functionality		[Milestone diamond]																																			
Assumptions and Notes:																																						
* BA = Business Analyst Resource, IT = Information Technology Resource																																						
<ol style="list-style-type: none"> Final regulations, forms, instructions and model agreements will be published at the end of August 2012. There is a dependency on IRS system work that must be completed prior to firm side system development. We assume that this work will be completed by December 2012 In parallel with proposed and final regulations analysis there is significant resource training and education that needs to occur on the new regulations The plan above is a composite based on feedback from multiple members and is a medium size firm with a global footprint The plan above does not reflect code freezes that are specific to individual firms and could limit the number of opportunities to release code within their system environments Resource availability will be an issue for implementation as tax resources are currently finishing Cost Basis implementation and new resources can require up to one year to train and onboard The plan has been optimized to limit the rework required for firms with a global footprint so they perform one design/development cycle vs. two in which US and non-US clients would be handled separately For withholding rules we assume there is a dependency on the client account plan and that withholding functional requirement development can't start until client account technical system design has been complete The plan assumes that the example firm has one set of the resources that are required to perform the functions of business analysis and technology work and that parallel development isn't supportable In addition to the two work streams listed above there is other work associated to FATCA implementation that is not captured in this plan (e.g. grandfathering, classification, reporting, etc. One of the drivers of the scope and complexity of the withholding work stream is the number of systems that will be affected. Current estimates range from 40 for a medium size firm to over 100 for a large global firm Along the lines of the number of systems affected, the number of products that a firm supports will correlate to the work effort required. Basically each product will have their system flow affected by FATCA 																																						