Title: Might owing shares to the NSCC get much more expensive post-split? (vs owing shares to other institutions)
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Created 2022-06-03 15:55:17 UTC
Permalink: /r/DDintoGME/comments/v42g7g/might_owing_shares_to_the_nscc_get_much_more/
Url: https://www.reddit.com/r/DDintoGME/comments/v42g7g/might_owing_shares_to_the_nscc_get_much_more/

TLDR: Could the upcoming split incentivize institutions to borrow from each other, rather than be short shares to the NSCC?

Background: It appears the NSCC formally charges flat rates of $0.25/day/share (1-30 days) and $3.00/share/day (30+ days), for failing to deliver shares. *Note, the phrase “for 1 to 31 days at close of business” led me to understand this as a daily fee. But I could definitely be wrong.*

Excerpt below from Addendum A “Fee Structure”, II “Trade Clearance Fees”, B “Fails to Deliver to CNS (Short-In CNS) –“ in NSCC Rules and Procedures

>*II. TRADE CLEARANCE FEES - represents fees for trade recording, netting, issuance of instructions to receive or deliver, effecting book-entry deliveries, and related activity.*

>*A. Clearance Activity Fee – The sum of: (a) a “value into the net” fee of $0.47 per million of processed value (i.e. for CNS and Balance Order netting, the sum of the contract amount and any CNS fail value), plus (b) a “value out of the net” fee of $2.56 per million of settling value (i.e. the absolute value of the CNS Long and Short Positions).*

>**B. Fails to Deliver to CNS (Short-In CNS) –**
>**1. $0.25 per item short in CNS for 1 to 30 days at close of business.**
>**2. $3.00 per item short in CNS for more than 30 days at close of business.**

Source: [NSCC Rules and Procedures, Addendum A-II-B “Fails to Deliver to CNS (Short-In CNS)”](https://www.dtcc.com/~/media/Files/Downloads/legal/rules/nscc_rules.pdf)