

**REPUBLIC OF THE PHILIPPINES
COURT OF TAX APPEALS
QUEZON CITY**

SPECIAL FIRST DIVISION

**GOVERNMENT OF SINGAPORE
INVESTMENT CORPORATION
PTE., LTD.,**

Petitioner,

C.T.A. CASE NO. 7726

Members:

- versus -

**ACOSTA, Chairperson
BAUTISTA, and
CASANOVA, JJ.**

**COMMISSIONER OF INTERNAL
REVENUE,**

Respondent.

Promulgated:

APR 29 2010 3:39 pm

X ----- X

DECISION

CASANOVA, JJ:

This Petition for Review seeks the refund or issuance of a Tax Credit Certificate (TCC) in the amount of NINETY FIVE MILLION FIVE HUNDRED THOUSAND FORTY EIGHT AND 61/100 pesos (PhP95,500,048.61), representing the final withholding taxes (FWT) erroneously withheld on the interest income derived by petitioner, GOVERNMENT OF SINGAPORE INVESTMENT CORPORATION PTE., LTD., from its investments in Philippine Treasury Bonds (T-)

bonds) during the period February 2006 to November 2007.

The facts of the case, as culled from the records, are as follows:

Petitioner is a corporation duly organized and existing under the laws of Singapore, with office at 168 Robinson Road, #37-01 Capital Tower, Singapore, 068912.¹

Petitioner is wholly-owned by the Government of Singapore. Its principal object is to manage Singapore's foreign reserves, and it is authorized and mandated to open and operate the custody of current accounts as may be necessary for safekeeping of assets and cash under its management.²

Respondent is the duly appointed Commissioner of Internal Revenue, vested with authority, among others, to act upon and approve claims for refund or tax credit of overpaid or erroneously paid internal revenue taxes, including final income tax withheld on interest income received by non-residents. Respondent holds office at the 5th Floor, Bureau of Internal Revenue (BIR) National Office Building, Agham Road, Diliman, Quezon City.³

Petitioner, through its custodian in the Philippines, The Hongkong and Shanghai Banking Corporation (HSBC), invested in various T-bonds with maturities of more than one (1) year. The yield of the T-bonds was represented by coupons, expressed as a percentage of the face value of the bonds on a per 

¹ Petition for Review, par. 1, Docket, p. 2

² Ibid, par. 2, Docket, p. 2

³ Ibid, par. 3, Docket, p. 2

annum basis, payable semi-annually.⁴

During the period February 2006 to November 2007, petitioner derived interest income from its investments in T-bonds amounting to PhP477,500,243.06, which was made subject to FWT of twenty percent (20%) for the total amount of PhP95,500,048.61 and which was later remitted to the BIR by the Bureau of Treasury.⁵

Petitioner alleges that, as a financing institution wholly-owned and controlled by the Government of Singapore, petitioner is exempt from income tax on income derived from its investments in T-bonds pursuant to Section 32(B)(7)(a), National Internal Revenue Code (the Tax Code) and Section 2.57.5 of Revenue Regulations No. 2-98, as amended.

On January 28, 2008, petitioner filed with the BIR an administrative claim for refund or issuance of TCC in the amount of PhP95,500,048.61, representing FWT erroneously withheld on the interest income derived by petitioner during the period February 2006 to November 2007 from its investments in T-bonds.⁶

Respondent has neither approved nor denied petitioner's administrative claim for refund. Hence, petitioner filed the instant petition.

Respondent, in her Answer⁷ filed on April 11, 2008, raised the following Special and Affirmative Defenses: 

⁴ Ibid, par. 4, Docket, p. 2

⁵ Ibid, par. 5 & 6, Docket, pp. 2-3

⁶ Joint Stipulation of Facts and Issues (JSFI), Item II(6), Docket, p. 112

⁷ Docket, pp. 80-85

"5. She reiterates and repleads the preceding paragraphs of this Answer as part of her Special and Affirmative Defenses;

6. Petitioner's alleged claim for tax refund/tax credit is subject to administrative investigation/examination by the respondent's Bureau;

7. Petitioner failed to demonstrate that the tax subject in the case at bar was erroneously or illegally collected;

8. Taxes paid and collected are presumed to have been paid in accordance with law and regulations. Hence, not refundable;

9. Petitioner failed to prove compliance with the governing rules relative to tax recovery or refund as provided under Sections 204(C) and 229 of the Tax Code, as amended;

10. In an action for tax refund/credit, the burden of proof rests upon the taxpayer to establish by sufficient and competent evidence its entitlement to a claim for refund/credit, and failure to adduce sufficient proof is fatal to the action for tax refund/credit (*Commissioner of Internal Revenue vs. Tokyo Shipping Co., Ltd.*, 244 SCRA 336);

11. It cannot be over-emphasized *tax exemption represents a loss of revenue to the government* and must, therefore, not rest on vague inference. When claimed, it must be *strictly construed against the taxpayer* who must prove that he falls under the exception. And if an exemption is found to exist, it must not be enlarged by construction, since the reasonable presumption is that the State has granted in express terms all it intended to grant at all, and that, unless the privilege is limited to the very terms of the statute, the favor would be extended beyond dispute in ordinary cases;

12. Basic is the rule that tax refunds are in the nature of tax exemptions and are to be construed *strictissimi juris* against the entity claiming the same (*Philippine Geothermal, Inc. vs. Commissioner of Internal Revenue*, G.R. No. 154028, July 27, 2005). Moreover, statutes in derogation of sovereignty such as those containing exemption from taxation should be *strictly construed* in favor of the State (*PLDT vs City of Davao*, 399 SCRA 442)."

During the trial on the merits, petitioner presented documentary and testimonial evidence. Respondent, however, manifested in open court, on May 

26, 2009, that she waives her right to present evidence.

In a Resolution⁸ promulgated on August 18, 2009, the Court considered the case submitted for decision, with the parties submitting their respective memorandum.

The parties agreed that the main issue⁹ to be submitted for the Court's resolution is:

"Whether or not petitioner is entitled to the refund or issuance of a TCC in the amount of PhP95,500,048.61, representing the FWT erroneously withheld on the interest income derived by petitioner during the period February 2006 to November 2007 from its investments in Philippine T-Bonds."

The issue may be broken down into the following sub-issues:

1. Whether or not petitioner is a financing institution wholly owned by the Government of Singapore;
2. Whether or not the interest income derived by the petitioner from its investments in Philippine T-bonds is exempt from income tax under Section 32(B)(7)(a), Tax Code and Section 2.57.5, Revenue Regulations No. 2-98;
3. Whether or not petitioner derived interest income in the gross amount of PhP477,500,243.06 from its investments in Philippine T-Bonds for the period February 2006 to November 2007;
4. Whether or not the interest income derived by petitioner from its investments in Philippine T-bonds for the period February 2006 to November 2007 was made subject to FWT at the rate of 20%; 

⁸ Docket, p. 541

⁹ JSFI, Docket, pp. 113-114

5. Whether or not the FWT on petitioner's interest income from Philippine T-Bonds for the period February 2006 to November 2007, amounting to PhP95,500,048.61, was remitted and paid to the BIR; and
6. Whether or not petitioner filed its administrative and judicial claims for refund or issuance of TCC in the amount of PhP95,500,048.61 representing FWT erroneously withheld on the interest income derived by petitioner during the period February 2006 to November 2007 from its investments in Philippine T-bonds, within the two-year prescriptive period provided under Sections 204(C) and 229, Tax Code.

Petitioner anchors its claim on Section 32(B)(7)(a) of the Tax Code which grants income tax exemptions on dividend income derived by (a) foreign governments, (b) financing institutions owned, controlled, or those enjoying refinancing from foreign governments, and (c) international or regional financial institutions established by foreign governments from investments in the Philippines in loans, stocks, bonds, or other domestic securities.

Petitioner asserts that it is a financial institution wholly-owned and controlled by the Government of Singapore whose principal objective is to preserve and enhance the international purchasing power of Singapore's reserves, and it is authorized and mandated to open and operate custody and current accounts as may be necessary for the safekeeping of assets and cash under its management.¹⁰

As financial institution wholly-owned and controlled by the Government of 

¹⁰ Petitioner's Memorandum, par. 22, Docket, p. 523

Singapore, petitioner now claims exemption from the payment of Philippine income taxes on any income derived from its investments in Philippine T-bonds.

In order to bolster its claim, petitioner submitted on January 23, 2008 a notarized and authenticated copy of the Certification¹¹ issued by the Ministry of Finance of the Republic of Singapore, signed by Ms. Sharon Ang, Deputy Director for Investment & Reserves, certifying that petitioner is wholly-owned by the Government of Singapore.

Petitioner further argues that since its interest income is exempt from income tax under Section 32(B)(7)(a) of the Tax Code, the income received from its investments in T-bonds is likewise exempt from FWT pursuant to Section 2.57.5, Revenue Regulations No. 2-98 (as amended).¹²

Petitioner's argument/contention is meritorious.

A careful examination of the documentary evidence presented by the petitioner reveals that it is indeed a financial institution wholly-owned by the Government of Singapore. Petitioner submitted the Certification issued by the Ministry of Finance of the Republic of Singapore, which was duly notarized and certified by the Philippine Consul in Singapore, Nathaniel G. Imperial, to prove due execution of the said document as required under Sections 19, 24 and 30 of Rule 132 of the Revised Rules of Court.

It is noteworthy to mention at this point that this Court can give due 

¹¹ Exhibit "B"

¹² Petitioner's Memorandum, par. 24, Docket, p. 524

credence to documents executed in a foreign country only if there is an authentication issued by any Philippine Consular Office, its officer or deputy, proving its due execution. As held by the Honorable Supreme Court in the case of ***Angelita Lopez vs Court of Appeals, et. al.***¹³, to wit:

"xxx when the special power of attorney is executed and acknowledged before a notary public or other competent official in a foreign country, it cannot be admitted in evidence unless it is certified as such in accordance with the foregoing provision of the rules by a secretary of embassy or legation, consul-general, consul, vice-consul or consular agent or by any officer in the foreign service of the Philippines stationed in the foreign country in which the record is kept of said public document and authenticated by the seal of the office. Xxx"

In the same vein, the Certificate of Authentication issued by the Philippine Consul in Singapore certifying the due execution of the document issued by Government of Republic of Singapore Ministry of Finance is sufficient to prove the validity and genuineness of said document. This was also the ruling of this Court in the case of *Government of Singapore Investment Corporation Pte. Ltd. vs. Commissioner of Internal Revenue*.¹⁴

"A perusal of the documentary evidence presented by petitioner reveals that indeed petitioner is wholly-owned and controlled by the Government of Singapore. This Court is convinced that the Certification issued by the Director of the Ministry of Finance of Singapore, which was duly notarized and certified by the Philippine Consul in 

¹³ G.R. No. 77008, December 29, 1987

¹⁴ CTA Case No. 6745, June 6, 2008

Singapore, xxx to prove due execution of the said document as required under Sections 19, 24, and 30 of Rule 132 of the Revised Rules of Court, is genuine and duly executed.”

Petitioner, having proven that it is a financial institution wholly-owned and controlled by the Government of Singapore, is therefore exempt from the payment of income tax and final withholding tax on the interest income it derived from its investments in Philippine T-bonds pursuant to the provision of Section 32(B)(7)(a) of the NIRC of 1997, as amended, and Section 2.57.5 of Revenue Regulations No. 2-98 (as amended).

It is represented that petitioner earned interest income from its investments in Philippine T-bonds in the aggregate amount of Php477,500,243.06 and 20% final tax was withheld therefrom amounting to Php95,500,048.61 for the period February 2006 to November 2007, broken down as follows:¹⁵

ISIN T-Bonds	Face Value (PhP)	Interest				
		Gross	Payable/ Coupon Date	Gross Amount (PhP)	20% Final Tax Withheld (PhP)	Net Amount (PhP)
		Interest Rate				
Account Group B						
PIBD1016I420	75,000,000.00	9.125	4-Mar-07	3,421,875.00	684,375.00	2,737,500.00
PIBD0713K457	30,000,000.00	7.125	2-May-07	1,068,750.00	213,750.00	855,000.00
PIBD1016K436	150,000,000.00	6.25	16-May-07	4,687,500.00	937,500.00	3,750,000.00
PIBD0309B132	10,000,000.00	8.5	17-Aug-07	425,000.00	85,000.00	340,000.00

¹⁵ Exhibit “E” (p. 2)

PIBD1016I420	75,000,000.00	9.125	4-Sep-07	3,421,875.00	684,375.00	2,737,500.00
PIBD0713K457	30,000,000.00	7.125	2-Nov-07	1,068,750.00	213,750.00	855,000.00
PIBD1016K436	50,000,000.00	6.25	16-Nov-07	1,562,500.00	312,500.00	1,250,000.00

Account Group C

PIBD0708B313	75,000,000.00	16	8-Feb-06	6,000,000.00	1,200,000.00	4,800,000.00
PIBD0713C438	1,000,000,000.00	8.75	3-Sep-06	43,750,000.00	8,750,000.00	35,000,000.00
PIBD0309B132	450,000,000.00	8.5	17-Feb-07	19,125,000.00	3,825,000.00	15,300,000.00
PIBD0713C438	1,000,000,000.00	8.75	3-Mar-07	43,750,000.00	8,750,000.00	35,000,000.00
PIBD1016I420	562,099,038.00	9.125	4-Mar-07	25,645,768.61	5,129,153.72	20,516,614.89
PIBD0713K457	1,650,000,000.00	7.125	2-May-07	58,781,250.00	11,756,250.00	47,025,000.00
PIBD1016K436	855,560,000.00	6.25	16-May-07	26,736,250.00	5,347,250.00	21,389,000.00
PIBD0309B132	455,000,000.00	8.5	17-Aug-07	19,337,500.00	3,867,500.00	15,470,000.00
PIBD0310B167	572,439,401.00	5.5	21-Aug-07	15,742,083.53	3,148,416.71	12,593,666.82
PIBD0512B658	321,393,385.00	5.75	21-Aug-07	9,240,059.82	1,848,011.96	7,392,047.86
PIBD0713C438	1,000,000,000.00	8.75	3-Sep-07	43,750,000.00	8,750,000.00	35,000,000.00
PIBD1016I420	562,099,038.00	9.125	4-Sep-07	25,645,768.61	5,129,153.72	20,516,614.89
PIBD0713K457	1,650,000,000.00	7.125	2-Nov-07	58,781,250.00	11,756,250.00	47,025,000.00
PIBD1016K436	500,000,000.00	6.25	16-Nov-07	15,625,000.00	3,125,000.00	12,500,000.00

Account Group H

PIBD0708B313	25,000,000.00	16	8-Feb-06	2,000,000.00	400,000.00	1,600,000.00
PIBD1016I420	115,000,000.00	9.125	4-Mar-07	5,246,875.00	1,049,375.00	4,197,500.00
PIBD0713K457	220,000,000.00	7.125	2-May-07	7,837,500.00	1,567,500.00	6,270,000.00
PIBD1016K436	398,890,000.00	6.25	16-May-07	12,465,312.50	2,493,062.50	9,972,250.00
PIBD0309B132	35,000,000.00	8.5	17-Aug-07	1,487,500.00	297,500.00	1,190,000.00
PIBD1016I420	115,000,000.00	9.125	4-Sep-07	5,246,875.00	1,049,375.00	4,197,500.00
PIBD0713K457	220,000,000.00	7.125	2-Nov-07	7,837,500.00	1,567,500.00	6,270,000.00
PIBD1016K436	250,000,000.00	6.25	16-Nov-07	7,812,500.00	1,562,500.00	6,250,000.00

TOTAL

P477,500,243.06 P 95,500,048.61 P382,000,194.45

As discussed by Ms. Cristina Averia, Manager for Client Services at the
Custody and Clearing Department of HSBC,¹⁶ by virtue of a Custody 

¹⁶ Exhibit "H"

Agreement,¹⁷ petitioner made the foregoing investments and received interest income therefrom.¹⁸ To further prove that it invested in Philippine T-bonds, petitioner submitted various bank confirmations and Bangko Sentral Registration Documents (BSRDs).¹⁹

In a sworn statement,²⁰ HSBC's Manager at the Corporate Actions Section of the Custody and Clearing Department, Ms. Karina Fatima Figueroa, described the nature of T-bonds as government-issued securities which mature beyond one (1) year. T-bonds are sold at face value on origination and the yield is represented by "coupons" expressed as a percentage of the face value on a *per annum* basis, payable semi-annually. On coupon payment date, HSBC is responsible for collecting the amounts due on petitioner's T-bond holdings and credits the same into petitioner's custody account.

Ms. Figueroa further explained that T-bonds are scripless securities, thus, are not evidenced by any physical certificate or document. Investments in government securities such as Treasury Bills (T-bills) and T-bonds are represented by units of participation in the electronic records of the Bureau of Treasury, otherwise known as the "Registry of Scripless Securities" (ROSS). Trading and settlement of government securities, as well as distribution of interest arising therefrom, are made through the electronic book entry system.

¹⁷ Exhibit "C"

¹⁸ Joint Stipulation of Facts and Issues (JSFI), Admitted Facts, par. II.4, p. 112

¹⁹ Exhibits "M-1" to "T-1-a"

²⁰ Exhibit "I-1"

rather than by the physical movement of certificates and other documents.

As a participant in the government securities market, HSBC maintains an account with the ROSS under which the T-bill and/or T-bond holdings of its clients, including petitioner, are recorded. Hence, the Bureau of Treasury (BTr), which is the withholding agent for the FWT due on interest income derived by non-resident foreign corporations from T-bonds,²¹ considers HSBC the payee of the interests due on such government securities for withholding tax purposes.²²

In a letter dated January 2, 2008,²³ the Bureau of Treasury issued a Statement of Taxes Withheld on the Coupon Due on the T-bond Holdings of HSBC-Custody Account for the years 2006 and 2007, as summarized below:

<u>Year</u>	<u>Final Taxes Withheld</u>
2006	P 46,360,956.36
2007	306,229,470.16
TOTAL	P 352,590,426.52

Note: Not all holdings in the HSBC custody account are Petitioner's holdings. Consequently, not all final taxes withheld are from Petitioner's interest income on investments in T-bonds.

HSBC issued a certification dated September 10, 2008 concerning petitioner's securities and cash accounts with HSBC-Manila,²⁴ and in turn 

²¹ JSFI, Admitted Facts, par. II.5, p. 275

²² Exhibit "I-1", A11

²³ Exhibit "D"

²⁴ Exhibit "K"

presented an Entitlement Report for petitioner²⁵ showing petitioner's holdings in Philippine T-bonds, the interest income earned from the said investments, and the final taxes withheld. This report is generated from the HSBC System which records all of the T-bill and T-bond holdings of its clients.²⁶ For the years 2006 and 2007, petitioner earned PhP477,500,243.06 interest income and P95,500,048.61 final taxes were withheld therefrom.

As testified to by HSBC's Manager at the Corporate Actions Section of the Custody and Clearing Department,²⁷ the foregoing interest income are credited to HSBC's Demand Deposit Account with the Bangko Sentral ng Pilipinas (BSP), net of withholding taxes, on coupon date. Thereafter, HSBC sends to petitioner an MT564 SWIFT Entitlement Advice showing the total coupon entitlement of the T-bonds and the net amount expected to be received. When the petitioner's custody account had been credited for the income earned, HSBC then sends an MT566 Confirmation Advice.²⁸ Evaluation of the said documents revealed that petitioner indeed earned interest income in the amount of PhP477,500,243.06 but received only PhP382,000,194.45 because PhP95,500,048.61 was withheld as final tax.²⁹

On September 12, 2008,³⁰ the Bureau of Treasury, through the Deputy Treasurer of the Philippines, sent a letter to HSBC with a Statement of FWT and 

²⁵ Exhibit "F"

²⁶ Exhibit "I-1", A13 to A14

²⁷ Exhibit "I-1", A12 and A17 to A18

²⁸ Exhibits "J-1" to "J-29"

²⁹ Details are attached hereto as Annex A

³⁰ Exhibit "U"

Remittances to BIR including the corresponding Journal Entry Voucher (JEV) No. and International Security Identification Numbers (ISIN) of the T-bonds.³¹ As indicated therein, for the period February 2006 to November 2007, the amounts of PhP46,360,956.36 and PhP306,229,470.15 representing final withholding taxes from the coupons or interest income received by the T-bond holdings recorded under HSBC-Custody Account were remitted by the BTr to the BIR.

The BIR subsequently certified that the following BTr JEV Nos. and International Security Identification Numbers (ISIN) indicated in the said BTr letter to HSBC were verified from the records of the Revenue Accounting Division:³²

<u>ISIN</u>	<u>BTR JEV NO.</u>	<u>DATE</u>
PIBD0708B313	06-02-1514	2/15/2006
PIBD0713C438	06-09-8531	9/7/2006
PIBD0309B132	07-02-1763	2/22/2007
PIBD0309B132	07-08-7913	8/23/2007
PIBD0310B167	07-08-7913	8/23/2007
PIBD0512B658	07-08-7913	8/23/2007
PIBD0713C438	07-03-2258	3/7/2007
PIBD1016I420	07-03-2258	3/7/2007
PIBD0713C438	07-09-8521	9/7/2007
PIBD1016I420	07-09-8521	9/7/2007
PIBD0713K457	07-05-4279	5/7/2007
PIBD1016K436	07-05-4773	5/22/2007
PIBD0713K457	07-11-10665	11/7/2007
PIBD1016K436	07-11-11245	11/22/2007

³¹ Exhibit "U-1"

³² Exhibit "V"

In sum, petitioner has sufficiently proven that it invested in Philippine T-bonds, earned interest income therefrom in the amount of PhP477,500,243.06 and the corresponding 20% final taxes of PhP95,500,048.61 were withheld and remitted by the Bureau of Treasury to the BIR.

As regards the issue of prescription, Section 204(C), in relation to Section 229 of the Tax Code, provides that claims for refunds should be made within the prescriptive period of two (2) years. On the other hand, Section 2.58(A)(2)(a) and (b) of Revenue Regulations No. 2-98 states that withholding tax returns, whether creditable or final, shall be filed and payments should be made within ten (10) days after the end of each month except for taxes withheld for December, which shall be filed on or before January 25 of the following year. For large taxpayers, however, the filing and payment should be made within twenty-five (25) days after the end of each month.

As may be gleaned from the records, petitioner filed an administrative claim for refund or issuance of TCC on January 28, 2008³³ and the instant Petition for Review was filed on February 1, 2008. Thus, based on the foregoing provisions of law, for the remittances made during the period of February 2006 to November 2007 from its investments in T-bonds, petitioner had until February 25, 2008 for claimable amount filed for February 2006; and, until November 2009 within which to file both its administrative and judicial claims for refund. 

³³ Exhibit "E"

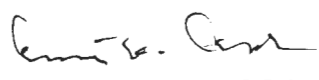
Therefore, considering the above premises, both the administrative and judicial claims were filed within the two (2)-year period required by law, particularly Section 229 in relation to Section 204 of the Tax Code and Section 2.58(A)(2)(a) and (b) of Revenue Regulations No. 2-98.

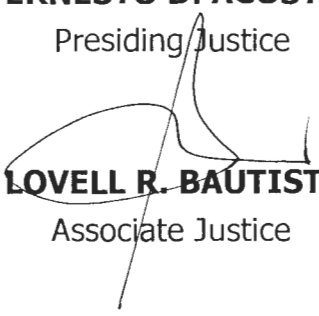
WHEREFORE, the instant Petition for Review is hereby **GRANTED**. Accordingly, respondent is hereby **ORDERED TO REFUND or ISSUE A TAX CREDIT CERTIFICATE** in favor of petitioner in the amount of NINETY FIVE MILLION FIVE HUNDRED THOUSAND FORTY EIGHT AND 61/100 pesos (Php95,500,048.61), representing 20% final taxes withheld on the interest income derived from petitioner's investments in Philippine T-bonds for the period February 2006 to November 2007.

SO ORDERED.


CAESAR A. CASANOVA
Associate Justice

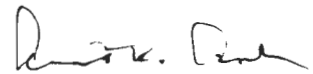
WE CONCUR:


ERNESTO D. ACOSTA
Presiding Justice


LOVELL R. BAUTISTA
Associate Justice

CERTIFICATION

I hereby certify that the above decision was reached after due consultation with the members of the Division of the Court of Tax Appeals in accordance with Section 13, Article VIII of the Constitution.



ERNESTO D. ACOSTA

Presiding Justice
Chairman, First Division

Summary of MT566 Confirmation Advices Sent by HSBC to Petitioner

Exhibit	Date Posted	ISIN T-Bonds	Face Value (PhP)	Interest	Gross Amount (PhP)	20% FWT (PhP)	Net Amount (PhP)
J-1	5-Mar-07	PIBD1016I420	75,000,000.00	9.125%	3,421,875.00	684,375.00	2,737,500.00
J-2	2-May-07	PIBD0713K457	30,000,000.00	7.125%	1,068,750.00	213,750.00	855,000.00
J-3	16-May-07	PIBD1016K436	150,000,000.00	6.250%	4,687,500.00	937,500.00	3,750,000.00
J-4	17-Aug-07	PIBD0309B132	10,000,000.00	8.500%	425,000.00	85,000.00	340,000.00
J-5	4-Sep-07	PIBD1013I420	75,000,000.00	9.125%	3,421,875.00	684,375.00	2,737,500.00
J-6	5-Nov-07	PIBD0713K457	30,000,000.00	7.125%	1,068,750.00	213,750.00	855,000.00
J-7	16-Nov-07	PIBD1016K436	50,000,000.00	6.250%	1,562,500.00	312,500.00	1,250,000.00
J-8	8-Feb-06	PIBD0708B313	75,000,000.00	16.000%	6,000,000.00	1,200,000.00	4,800,000.00
J-9	4-Sep-06	PIBD0713C438	1,000,000,000.00	8.750%	43,750,000.00	8,750,000.00	35,000,000.00
J-10	19-Feb-07	PIBD0309B132	450,000,000.00	8.500%	19,125,000.00	3,825,000.00	15,300,000.00
J-11	5-Mar-07	PIBD0713C438	1,000,000,000.00	8.750%	43,750,000.00	8,750,000.00	35,000,000.00
J-12	5-Mar-07	PIBD1016I420	562,099,038.00	9.125%	25,645,768.61	5,129,153.72	20,516,614.89
J-13	2-May-07	PIBD0713K457	1,650,000,000.00	7.125%	58,781,250.00	11,756,250.00	47,025,000.00
J-14	16-May-07	PIBD1016K436	855,560,000.00	6.250%	26,736,250.00	5,347,250.00	21,389,000.00
J-15	17-Aug-07	PIBD0309B132	455,000,000.00	8.500%	19,337,500.00	3,867,500.00	15,470,000.00
J-16	21-Aug-07	PIBD0310B167	572,439,401.00	5.500%	15,742,083.53	3,148,416.71	12,593,666.82
J-17	21-Aug-07	PIBD0512B658	321,393,385.00	5.750%	9,240,059.81	1,848,011.96	7,392,047.85
J-18	4-Sep-07	PIBD0713C438	1,000,000,000.00	8.750%	43,750,000.00	8,750,000.00	35,000,000.00
J-19	4-Sep-07	PIBD1016I420	562,099,038.00	9.125%	25,645,768.61	5,129,153.72	20,516,614.89
J-20	5-Nov-07	PIBD0713K457	1,650,000,000.00	7.125%	58,781,250.00	11,756,250.00	47,025,000.00
J-21	16-Nov-07	PIBD1016K436	500,000,000.00	6.250%	15,625,000.00	3,125,000.00	12,500,000.00
J-22	8-Feb-06	PIBD0708B313	25,000,000.00	16.000%	2,000,000.00	400,000.00	1,600,000.00
J-23	5-Mar-07	PIBD1016I420	115,000,000.00	9.125%	5,246,875.00	1,049,375.00	4,197,500.00
J-24	2-May-07	PIBD0713K457	220,000,000.00	7.125%	7,837,500.00	1,567,500.00	6,270,000.00
J-25	16-May-07	PIBD1016K436	398,890,000.00	6.250%	12,465,312.50	2,493,062.50	9,972,250.00
J-26	17-Aug-07	PIBD0309B132	35,000,000.00	8.500%	1,487,500.00	297,500.00	1,190,000.00
J-27	4-Sep-07	PIBD1016I420	115,000,000.00	9.125%	5,246,875.00	1,049,375.00	4,197,500.00
J-28	5-Nov-07	PIBD0713K457	220,000,000.00	7.125%	7,837,500.00	1,567,500.00	6,270,000.00
J-29	16-Nov-07	PIBD1016K436	250,000,000.00	6.250%	7,812,500.00	1,562,500.00	6,250,000.00
TOTAL					477,500,243.06	95,500,048.61	382,000,194.44

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