

CONTENTS

I. INTRODUCTION AND SUMMARY	1
II. OUTLINE OF RECENT DEBT RESTRUCTURING OPERATIONS.....	3
Mexico.....	3
Philippines	4
Costa Rica.....	5
Venezuela.....	6
Uruguay.....	7
III. ANALYSIS OF COMMERCIAL BANK RESPONSES.....	9
Mexican Financing Package.....	10
Philippine Financing Package	18
Costa Rican Financing Package.....	25
IV. CREDITOR COUNTRY ANALYSIS	28
United Kingdom	33
Institutional Framework.....	34
Disclosure Guidelines.....	34
Nonaccrual Loans	35
Tax Issues.....	40
Tax and Regulatory Treatment of Specific Instruments.....	42
ANNEX 1	49
ANNEX 2.....	60
ANNEX 3	61
Canada.....	80
Institutional Framework.....	80
Disclosure Guidelines.....	81
Non-Performing Loans.....	81
Accounting and Regulatory Issues	82
Country Risk Provisioning.....	82
Tax Issues.....	84
Tax and Regulatory Treatment of Specific Instruments.....	86
ANNEX 1	90
ANNEX 2.....	94

United States.....	107
Institutional Framework	107
Disclosure Guidelines	108
Nonaccrual Loans	109
Tax and Regulatory Treatment of Loan Loss Reserves.....	110
Accounting and Regulatory Treatment of Debt Reduction.....	113
Tax Treatment of Debt Reduction	116
Other Tax, Accounting and Regulatory Issues.....	118
Tax and Regulatory Treatment of Specific Instruments.....	120
ANNEX 1.....	126
ANNEX 2.....	131
ANNEX 3.....	137
ANNEX 4.....	140
ANNEX 5.....	141
ANNEX 6.....	146
ANNEX 7.....	151
ANNEX 8.....	154
ANNEX 9.....	159
Japan	161
Tax and Regulatory Issues	161
Tax and Regulatory Treatment of Specific Instruments.....	165
ANNEX 1.....	168
France	169
Institutional Framework	169
Disclosure Guidelines.....	169
Nonaccrual Loans	170
General Tax and Accounting Issues.....	171
Tax and Regulatory Treatment of Specific Instruments.....	172
ANNEX 1	176
ANNEX 2	184
ANNEX 3	186
Germany.....	190
Institutional Framework	190
Disclosure Guidelines.....	192
Nonaccrual Loans	192
Tax and Regulatory Treatment of Loan Loss Provisions.....	192
Other Tax, Accounting and Regulatory Issues.....	196
ANNEX 1	201
GENERAL ANNEX 1	212