NOTE AS TO EARLIER COMMENCEMENT ORDERS

Total compliance costs

- **13.** It has not been possible to produce more than very broad brush estimates based on illustrative assumptions.
 - Substantial revision of computer programmes may well be needed by most medium and large institutions outside the banking and building societies area. This might affect some 500 firms, at a weighted average cost of around £40,000 each. Ongoing maintenance might be 10 per cent. of this total.
 - Identification procedures will require new manuals to be produced by all but the smallest firms, at a total cost of perhaps £3 million, and the procedures may increase ongoing staff workload by perhaps 500,000 man-hours.
 - Staff training might amount to some 500,000 man-hours annually, with additional total set-up costs of perhaps £5 million.
 - Recurring record-keeping costs might be of the same order.