

MEMORANDUM

To: File

From: John Fieldsend
Special Counsel
Office of Rulemaking
Division of Corporation Finance
U.S. Securities and Exchange Commission

Date: March 11, 2011

Re: Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act Regarding Congolese Conflict Minerals

On March 11, 2011, Paula Dubberly, Felicia Kung, Lillian Brown and John Fieldsend of the Division of Corporation Finance participated in a telephone call with Patricia Jurewicz of the Responsible Sourcing Network, a project of As You Sow, Tim Mohin of Advance Micro Devices Inc., Darren Fenwick of The Enough Project, Jay Celorie of Hewlett-Packard Company, Sandy Merber of General Electric Co., Lauren Compere of Boston Common Asset Management, LLC, Susan Baker of Trillium Asset Management, LLC, Monique Beadle of Falling Whistles, Monique Oxender of Ford Motor Company, Karen Strauss of Free the Slaves, Kambale Musavuli of Friends of the Congo, Laura Berry of the Interfaith Center on Corporate Responsibility, Azadeh Sabour of Jantzi-Sustainalytics Inc., Peter DeSimone and Kristin Lang of the Social Investment Forum, and John Kleiderer of the Jesuit Conference. The participants discussed the Commission's required rulemaking in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which relates to reporting requirements regarding conflict minerals originating in the Democratic Republic of the Congo and adjoining countries.