MEMORANDUM

TO: File

FROM: Yue Ding

RE: Conference call with Bank of America regarding security-based swap transaction

reporting requirements

DATE: October 1, 2010

On September 30, 2010, Brian Trackman from the Securities and Exchange Commission ("SEC") held a phone conference with representatives from Bank of America. The Bank of America representatives were Maria Blanco, Marc Winters, Nick Kolick, Catherine Napolitano, Gregory Todd, Jared Gianatasio, Kevin G Finnegan, Kevin MacMillan, Arran Yentob, Lisa Draper, and Christian Amerino.

Bank of America offered high level thoughts mostly on policy issues beyond the scope of burdens, costs, and benefits of security-based swaps regulation.

