MEMORANDUM

TO: File

FROM: Richard Grant

RE: Meeting with Representatives of SIFMA

DATE: September 28, 2012

On September 28, 2012, representatives from the Securities and Exchange Commission ("SEC") participated in a meeting with representatives from the Securities Industry and Financial Markets Association ("SIFMA"). The SEC representatives present at the meeting were Brian Bussey, Heather Seidel, Tom McGowan, Matthew Daigler, Wenchi Hu, Richard Gabbert, Brian Trackman, Mike Bradley, Yvonne Fraticelli, Lourdes Gonzalez, Matt Landon and Richard Grant, with Amar Kuchinad, Leah Mesfin, and David Liu participating telephonically. The SIFMA representatives present at the meeting were Keith Bailey (Barclays), Gregory Todd (Bank of America Merrill Lynch), Jon Blizzard (HSBC), Don Bendernagel (Citi), Ira Hammerman (SIFMA), Ken Bentsen (SIFMA), Kyle Brandon (SIFMA), Annette Nazareth (Davis Polk), and Gabe Rosenberg (Davis Polk).

At the meeting, the SIFMA representatives provided their views and observations on the application of Title VII of the Dodd-Frank Wall Street Reform and Consumer Protection Act to their global security-based swaps businesses. They also provided their views and observations on the Commodity Futures Trading Commission's interpretative guidance on the cross-border application of certain Dodd-Frank swap provisions.

