

MEMORANDUM

TO: File No. S7-18-21
FROM: Division of Trading and Markets
RE: Meeting with the Investment Company Institute
DATE: March 16, 2022

On March 16, 2022, representatives of the Division of Investment Management (“IM”), the Division of Trading and Markets (“TM”), and the Division of Economic and Risk Analysis (“DERA”) participated in a teleconference with representatives of the Investment Company Institute (“ICI”). The IM representatives were Viktoria Baklanova, Trace Rakestraw, and Penelope Saltzman. The TM representatives were Haoxiang Zhu, Joshua Nimmo, Josephine J. Tao, John Guidroz, Joan Collopy, and Theresa Hajost. The DERA representatives were Amy Edwards, Paul Barton, Qiyu Liu, and Peter Dixon. The ICI Street participants were Sarah Bessin, Mark Whipple, Elizabeth Kent, Jason Strofs, Christopher Michailoff, John Driscoll, Jared Black, David Silva, Julie Richmond, John Granger, and Sean Collins.

The participants discussed issues/matters raised in ICI’s comment letters concerning Proposed Rule 10c-1.