

MEMORANDUM

To: File No. S7-32-10

From: Rajal B. Patel, Senior Special Counsel, Office of Derivatives Policy, Division of Trading and Markets

Re: Meeting with representatives from the International Association of Credit Portfolio Managers

On Monday, August 1, 2022, Carol McGee, Richard Mo, Rajal Patel, and Pam Carmody (staff in the Division of Trading and Markets), and Ted Yu and Valian Afshar (staff in the Division of Corporation Finance) held a conference call with Som-lok Leung and Jennifer Bearden of the International Association of Credit Portfolio Managers; Carrie Na of Truist Financial; Kevin Starrett and Michael Cooney of Citigroup; Bill Ledger of JPMorgan; and Gareth Old and Shea Cunnington of Clifford Chance. The general topic discussed was the Commission's proposed rule on Position Reporting of Large Security-Based Swap Positions.