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 Tuesday, July 19, 2022, Carol McGee, Rajal Patel, and Pam Carmody (staff in the Division of Trading and Markets); Juan Echeverri, Y.C. Loon, and Jovan Stojkovic (staff in the Division of Economic and Risk Analysis); 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; Kevin Starrett 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.