

## MEMORANDUM

**To:** File

**From:** John Fieldsend  
Special Counsel  
Office of Rulemaking  
Division of Corporation Finance  
U.S. Securities and Exchange Commission

**Date:** March 17, 2017

**Re:** Reconsideration of Conflict Minerals Rule Implementation Pursuant to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act

---

On March 17, 2017, Elizabeth Murphy, Felicia Kung, and John Fieldsend of the Division of Corporation Finance participated in a call with Barbara Jennings of the Midwest Coalition for Responsible Investment, Willem Hettinga of APG Asset Management, Taylor Reed of Figure 8 Investment Strategies, Arthur van Mansvelt of Triodos Investment Management, Lauren Compere of Boston Common Asset Management, Make Garland of the Office of the New York City Comptroller, Susan Baker of Trillium Asset Management, Nicole Lee of Miller Howard Investments, Steve Herro of St. Norbert Abbey, and Patricia Jurewicz of Responsible Sourcing Network. The participants discussed Acting Chairman Michael S. Piwowar's request for feedback from the public on all aspects of the conflict minerals rule, which was promulgated under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, and the 2014 staff guidance.