Division of Clearing and Intermediary Oversight

U.S. COMMODITY FUTURES TRADING COMMISSION

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MEMORANDUM

TO: Comment File for Proposed Risk Management Requirements for Derivatives

Clearing Organizations (76 FR 3698, Jan. 20, 2011)

FROM: Phyllis Dietz

DATE: March 15, 2011

SUBJECT: Meeting with representatives of Pierpont Securities regarding proposed

regulations for derivatives clearing organization (DCO) risk management,

participant and product eligibility, and open access

On March 15, 2011, at 3:00 p.m. EDT, staff of the CFTC Division of Clearing and Intermeidary Oversight (DCIO) and the Division of Market Oversight met with representatives of Pierpont Securities. Chairman Gary Gensler joined for part of the meeting. The discussion touched on issues relating to swap execution facilities, margin requirements, DCO clearing membership requirements, and access to swaps clearing. Pierpont Securities was invited to submit a written comment in order to provide a more detailed discussion of its views.

Participants:

CFTC: Chairman Gary Gensler, Phyllis Dietz, Jonathan Lave, Jake Preiserowicz, Riva Adriance, Mauricio Melara

Pierpont Securities: Mark Werner, Christopher Vogel, RC Whitehead