

TO: The Comment File
FROM: Cody Alvarez
RE: Comment on Proposed Account Ownership and Control Report Rules
DATE: April 6, 2011

On April 5, 2011, Commission staff participated in a telephonic conference with FIA and members of FIA's OCR Working Group to discuss certain issues relating to the rule proposed in Federal Register Vol. 75, No. 137, July 19, 2010, RIN 3038-AC63, Account Ownership and Control Report. Participating by telephone on behalf of the OCR Working Group were; Mary Ann Burns of FIA, Mark Fabian and Susan Gallant of ICE Futures, Bill Metzger of Citigroup, Jim Moran of CME Group, Tim Mundt of MF Global, Zach Schweder of Peregrine Financial, Leslie Sutphen of Financial Markets Consulting, Patrick Tessier of Citigroup, Ray Tubridy of State Street Global Markets, and James Woods of FIA. Commission participants were; Cody Alvarez, Rachel Berdansky, Jerry Golley, Jordan Grimm, Donald Heitman, Jorge Herrada, Gary Martinaitis, Ryne Miller, James Outen, Robert Pinchbeck, Sebastian Pujol, Howard Rosen, and Stephen Sherrod.

Participants generally discussed Commission staff's questions regarding FIA's March 22, 2011, comment letter. Specifically, CFTC staff asked the OCR Working Group what account types might not be captured under FIA's proposed OCR alternative. Participants also discussed the account ownership and control information currently available to clearing and non-clearing FCMs as a means of evaluating potential alternatives to the proposed OCR.