

TO: The Comment File
FROM: Cody Alvarez
RE: Comment on Proposed Account Ownership and Control Report Rules
DATE: February 7, 2012

On December 20, 2011, Commission staff participated in a telephonic conference with representatives from the Futures Industry Association (“FIA”) and members of FIA’s OCR Working Group to discuss certain issues relating to the rules 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, James Woods, and Barbara Wierzynski of FIA; Mark Fabian and Susan Gallant of ICE Futures U.S.; Kevin Foley of Katten Muchin Rosenman LLP; Reggie Griffith of Newedge; Joanna Mallers of Nico Trading; Bill Metzger; Jim Moran and Aaron Morris of CME Group Inc.; Mary Beth Rooney of Citigroup Inc.; Bernie Sapato of J.P. Morgan; Leslie Sutphen of Chopper Trading; and Ray Tubridy of State Street Global Markets. Commission participants were: Cody Alvarez, Srinu Bangarbale, Rachel Berdansky, Jerry Golley, Richard Haynes, Ryne Miller, Sebastian Pujol Schott, Mark Schlegel, Andy Thatai, and Ed Wehner.

Participants generally discussed Commission staff’s thoughts regarding modifications of the proposed Account Ownership and Control Report. Specifically, Commission staff outlined a possible method for collecting ownership and control information with respect to omnibus accounts.