

RE: Comment on Ownership and Control Reports, Forms 102/102S, 40/40S, and 71

On August 3, 2012, Commission staff participated in a telephonic conference with FIA and members of FIA's OCR Technical Standards Working Group (the "Working Group") to discuss certain issues relating to the rules proposed in Federal Register Vol. 77, No. 144, July 26, 2012, RIN 3038-AD31, Ownership and Control Reports, Forms 102/102S, 40/40S, and 71.

Participating by telephone on behalf of the Working Group were: Dale Spoljaric of Barclays; Bruce Beatus of Bank of America Merrill Lynch; Daniel Laczynski of Bank of America Merrill Lynch; Renee Rozier of Bank of America Merrill Lynch; Donald Svec of Bank of America Merrill Lynch; Karen Christiansen of CBOE; Jim Lubin of CBOE; Kadi Kannapell of Citigroup; Robert Klein of Citigroup; William Rickhoff of Citigroup; Sandra Valtierra of CME Group; Ronney Rosenberg of Credit Suisse; Renia Shukis of Credit Suisse; Athena Eastwood of CWT; Paul Pantano of CWT; Barry Brown of Deutsche Bank; Bill Metzger of Deutsche Bank; John VanDerBleek of Deutsche Bank; Dan McElduff of ELX Futures; Mary Ann Burns of FIA; Joanna Mallers of FIA; Barbara Wierzynski of FIA; Justin Palamara of Goldman Sachs; Jason Tarantino of Goldman Sachs; Brian Brody of HSBC; Sylvian Hom of HSBC; David Sturm of HSBC; R.J. Cummings of ICE; Mark Fabian of ICE; Susan Gallant of ICE; Kurt Windeler of ICE; John Munro of ION Trading; Scott Robson of ION Trading; Tom Bales of Jefferies; Maureen Gaffney of Jefferies; Anne Byerwalter of JP Morgan; Meryl Fogg of JP Morgan; Richard Kim of JP Morgan; Kevin Foley of Katten Law; Maureen Guilfoile of Katten Law; Steve Fukuda of Knight Capital; Mark Basile of Macquarie Group; David Louw of Macquarie Group; Jim Bohlsen of Mizuho; Hillary Clark of Morgan Stanley; Charles Collins of Morgan Stanley; Daniel Carrigan of NASDQ OMX; Aaron Leong of Newedge; Christine Show of Newedge; Joe Warda of Newedge; Ronald Filler of NYLS; Tom McCabe of OneChicago; Kirk Smith of OneChicago; Amy Meyer of R.J. O'Brien; Marie-Anne Clarke of RBS; Ray Tubridy II of State Street; Janet Lobacz of SunGard; Martha Johnson of Term Commodities; Robert Unuguary of Term Commodities; Gloria Wadsworth of Term Commodities; Tammy Zimmer of Term Commodities; Patrick DiMarco of UBS; and Constance Taylor of UBS.

Participating by telephone on behalf of the Commission were: Sebastian Pujol Schott; Rachel Berdansky; Kate Mitchel; Howard Rosen; Jerry Golley; Jeffrey Moore; Christopher Hornbecker; and Donald Wishard.

Participants generally discussed the timing of required updates to the Form 102; the applicability of the proposed reportable trading volume level (50 or more contracts) to trading on a swap execution facility; and potential methods by which the Commission might share information it collects via the proposed forms with designated contract markets. Commission participants advised the Working Group to submit any comments regarding these or other topics via formal comment letters.