

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

On August 16, 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: John Monroe of ION Trading; Scott Robson of ION Trading; Kadi Kannapell of Citigroup; Mary Beth Rooney of Citigroup; Bill Metzger of Deutsche Bank; Scott Abernathy of Newedge; Sandra Valtierra of CME Group; Luciano Dinorcia of BNP Paribas; Bob Koenig of Knight Capital; Meryl Fogg of JP Morgan; Renia Shukis of Credit Suisse; Don Svec of Bank of America Merrill Lynch; Janet Lobacz of SunGard; Mary Ann Burns of FIA; and James Woods of FIA.

Participating by telephone on behalf of the Commission were: Kate Mitchel; Howard Rosen; Andy Thatai; Jeffrey Moore; Donald Wishard; and Mark Schlegel.

Participants generally discussed the timing of the implementation of Legal Entity Identifiers (LEIs), which are reportable on the proposed forms, and the creation of XML standards for the transmission of data via the proposed forms.