MEMORANDUM

To: File

From: John Fieldsend

Special Counsel

Office of Rulemaking

Division of Corporation Finance

U.S. Securities and Exchange Commission

Date: October 4, 2010

Re: Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection

Act Regarding Congolese Conflict Minerals

On October 4, 2010, Paula Dubberly, Felicia Kung, Lillian Brown, Steven Hearne, and John Fieldsend of the Division of Corporation Finance met with Rick Goss of the Information Technology Industry Council, Christopher Turner of Dell, Jon S. Beamer of Nokia Inc., Lisa Errion of Apple Inc., Holly A. Evans of AMD, Andrea Fava of Intel Corporation, Erica Fensom of Research In Motion Limited, Meredith Golemon of Oracle Corporation, Booth S. Jameson of Hewlett-Packard Company, Michael E. Loch of Motorola, Inc., William Morin of Applied Materials, Inc., Susan Tuttle of IBM, and Joel Wiginton of Sony Corporation. The participants discussed the Commission's required rulemaking in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which relates to reporting requirements regarding conflict minerals originating in the Democratic Republic of the Congo and adjoining countries.