
M E M O R A N D U M

To : File

**From : Tamara Brightwell
Senior Special Counsel
Division of Corporation Finance
U.S. Securities and Exchange Commission**

**Re : Section 1504 of the Dodd-Frank Wall Street Reform and Consumer
Protection Act**

Date : September 23, 2010

On September 23, 2010, Paula Dubberly, Roger Schwall, Tamara Brightwell, Elliot Staffin, and George Schuler of the Division of Corporation Finance met with Bennett Freeman, Calvert Asset Management; Paul Bugala, Calvert Asset Management; and Peter DeSimone, Social Investment Forum. The participants discussed Section 1504 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which requires the Commission to issue rules requiring resource extraction issuers to disclose information relating to payments made to governments for the purpose of commercial development of oil, natural gas, or minerals.



August 30, 2010

Tamara Brightwell
Division of Corporate Finance
Securities and Exchange Commission

Dear Tamara,

I am writing to request a meeting to discuss the rulemaking process for Section 1504 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. My colleague Paul Bugala and I would like to address our comments on behalf of Calvert Asset Management Co., Inc., a diversified financial services company with \$14.4 billion under management as of August 27, 2010, and the Social Investment Forum (SIF), the U.S. membership association representing financial professionals and organizations engaged in the practice of socially responsible and sustainable investing.

Proposed agenda:

- Introduction of Calvert Asset Management Co., Inc. and the Social Investment Forum (SIF)
- Discussion of the rulemaking timeframe and process
- Discussion of priorities for Calvert and SIF that will be addressed our forthcoming white paper regarding Section 1504

Per your instructions, the following is a list of the upcoming dates when we are available for a meeting at your offices. It is our preference to meet in the afternoon on September 9, 10, 13, 16, 17, 21, 23 or 24.

We look forward to meeting with you and discussing this very important process.

Sincerely,

Bennett Freeman
Senior Vice President
Sustainability Research and Policy
Calvert Asset Management Co., Inc.
4550 Montgomery Ave., Suite 1000N
Bethesda, MD 20814

CC:

Paul Bugala
Sustainability Analyst, Extractive Industries
Calvert Asset Management Co., Inc.