MEMORANDUM

TO: File

FROM: Kathleen M. Kelly, Branch Chief, OIA

RE: Meeting with HSBC DATE: November 16, 2011

On September 21, 2011, Ethiopis Tafara, Director of the U.S. Securities and Exchange Commission's (SEC) Office of International Affairs (OIA) and Kathleen Kelly, Senior Counsel in the SEC's OIA, met with Ms. Suzy White, Senior Vice President and Deputy Chief Operating Officer for the Americas at HSBC and Thomas J. Rosenkoetter from HSBC.

The representatives from HSBC and SEC staff discussed issues relating to the timing of SEC implementation of the Dodd-Frank Act Title VII rules and the need for consistency among SEC and CFTC rulemakings on Title VII.

