



MEMORANDUM

To: File
From: Bonnie Gauch
Date: May 15, 2007
RE: Phone call with Marshall Levinson regarding Exchange Act Release No. 55431 (File No. S7-08-07), titled "Amendments to Financial Responsibility Rules for Broker-Dealers"

Staff of the Division of Market Regulation spoke today with Marshall Levinson, who is involved in coordinating the comment letter that the Securities Industry and Financial Markets Association (or "SIFMA") intends to send to the Commission regarding Exchange Act Release No. 55431. The Commission staff on the phone call were Michael Macchiaroli and Bonnie Gauch. Those present generally discussed preliminary questions and comments Mr. Levinson and the SIFMA industry participants had regarding the release.