

MEMORANDUM

To: Commission File No. S7-08-10
Commission File No. DF Title IX – Asset-Backed Securities

From: Rolaine S. Bancroft
Attorney-Advisor
Office of Rulemaking
Division of Corporation Finance
U.S. Securities and Exchange Commission

Date: January 26, 2011

Re: Meeting with CMBS Portfolio Managers

On January 25, 2011, Paula Dubberly, Katherine Hsu, Rolaine Bancroft and Jay Knight of the Division of Corporation Finance met with certain CMBS portfolio managers. The topics discussed were the Commission's April 7, 2010 proposing release regarding asset-backed securities and Title IX, Subtitle D, Section 941 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. Agenda and list of participants are attached.

Attachment

Agenda

1. Regulatory support for improved disclosure in CMBS offerings
2. Best solutions for risk retention for CMBS

CMBS Portfolio Managers

Richard Avidon, Deutsche Asset Management

Jason Brooks, TIAA-CREF

John Fitzpatrick, Allstate

Brian Furlong, New York Life

Marshall Glick, Alliance Bernstein

Tricia Hall, Paulson and Company

Gary Horbacz, Prudential Insurance

Kathy Knudson, Nationwide

Steve Kraljic, TIAA-CREF

William Moretti, MetLife

Caroline Natale, Wellington Asset Management

Marc Peterson, Principal Life Insurance

Joan Sapinsley, Resource Real Estate

Mark Warner, Blackrock

Doug Weih, AEGON