

MEMORANDUM

To: File Nos. S7-08-12, S7-26-15

From: Richard Gabbert, Counsel to Commissioner Hester M. Peirce

Re: Meeting with SIFMA Asset Management Group and Futures Industry Association

On February 14, 2019, Commissioner Hester Peirce and her legal advisor, Richard Gabbert, participated in a discussion with the following individuals:

- CFTC Commissioner Brian Quintenz;
- Allison Lurton, Futures Industry Association;
- Jason Silverstein, SIFMA Asset Management Group;
- Ruth Arnould, Bank of America Merrill Lynch;
- Christopher Edmonds, Intercontinental Exchange, Inc.
- Jaime Madell, Guggenheim Partners;
- Jason Radzik, BNP Paribas;
- William Thum, Vanguard;
- Colin Lloyd, Cleary Gottlieb;
- Wendy Yun, Goldman Sachs Asset Management
- Deborah North, Allen and Overy; and
- Eric Aldous, RBC.

Participants discussed issues relating to Title VII capital, margin, and segregation requirements applicable to security-based swap dealers, to security-based swap data reporting requirements, and to implementation of these requirements.