

## Memorandum

**To:** File No. S7-11-06

**From:** Kevin O'Neill  
Division of Corporation Finance

**Re:** Meeting with Members of Community Bankers Council of  
American Bankers Association

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On October 23, 2006, representatives from the Division of Corporation Finance and the Office of the Chief Accountant met with members of the Community Bankers Council of the American Bankers Association and other personnel from that organization and discussed the Commission's July 11, 2006 Concept Release Concerning Management's Reports on Internal Control Over Financial Reporting.