

## MEMORANDUM

To: File No. S7-13-07  
Release Nos. 33-8818, 34-55998; International Series Release No. 1302

From: Thomas Kim

Date: October 26, 2007

Re: Meeting with representatives of investment banks

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On October 16, 2007, Michael Halloran, James Eastman and Thomas Kim of the Chairman's Office, Elizabeth King of the Division of Market Regulation, Conrad Hewitt and Paul Beswick of the Office of Chief Accountant, and John White of the Division of Corporation Finance met with the following representatives of investment banks: Gregory Palm of Goldman, Sachs; Gary Lynch of Morgan Stanley; Edward Greene of Citigroup; Richard Walker of Deutsche Bank; and Alan Beller of Cleary, Gottlieb, Steen & Hamilton. Among other things, the representatives discussed the above-referenced rule proposal to eliminate the U.S. GAAP reconciliation requirement for foreign private issuers, and expressed their general support for the rule proposal.