

## MEMORANDUM

TO: File  
FROM: Leah Drennan  
RE: Telephonic meeting with representatives of NAIC and NYDFS  
DATE: October 5, 2011

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On October 5, 2011, Donna Chambers, Andrew Schoeffler, Amy Starr, and Leah Drennan of the Securities and Exchange Commission telephonically attended a meeting with Terry Arbit, David Aron, Lee Ann Duffy, Julian Hammar, Stephen Kane, and Kenneth McCracken of the Commodity Futures Trading Commission; Larry Bruning, Ryan Couch, Mark Sagat, Robert Schump, and Todd Sells of the National Association of Insurance Commissioners (“NAIC”); and James Everett and Paul Zuckerman of New York Department of Financial Services (“NYDFS”).

The participants discussed the swap definition and particularly the proposed rules and interpretive guidance related to insurance.

[No agenda available for this meeting.]