

MEMORANDUM

To: File No. S7-26-15

From: Yvonne Fraticelli

Subject: Summary of meeting with representatives from the International Swaps and Derivatives Association (“ISDA”)

Date: October 4, 2019

On October 3, 2019, representatives from the Securities and Exchange Commission’s Division of Trading and Markets (Elizabeth Baird, Michael Gaw, Carol McGee, Dave Michehl, Jeffrey Mooney, Stephanie Park, Susan Peterson, Justin Pica, Ajay Sutaria, Andrew Shanbrom, Mark Wolfe, and Yvonne Fraticelli), and from the office of Commissioner Peirce (Richard Gabbert), met with Tara Kruse, Eleanor Hsu, and Christopher Young of ISDA. Among the topics discussed were issues related to the Commission’s proposed rules governing the form and manner in which security-based swap data repositories will be required to make security-based swap data available to the Commission (File No. S7-26-15), including the importance of aligning the Commission’s rules with the rules of the CFTC and with international security-based swap reporting requirements to the extent possible.