

**MEMORANDUM**

June 29, 2011

To: File

From: Gena Lai  
Office of Commissioner Troy A. Paredes

Re: S7-39-10 Further Definition of "Swap Dealer," "Security-Based Swap Dealer," "Major Swap Participant," "Major Security-Based Swap Participant," and "Eligible Contract Participant"

S7-34-10 Regulation SBSR - Reporting and Dissemination of Security-Based Swap Information

On June 29, 2011, Commissioner Troy A. Paredes and Gena Lai, Counsel to the Commissioner, met with the following individuals representing Bank of America: Kevin MacMillan, Sarah Lee, Thomas Patrick, and Greg Todd. The participants discussed generally issues relating to the implementation of Title VII of the Dodd-Frank Act, including timing, inter-affiliate trades, and extraterritoriality.