

MEMORANDUM

To: File

From: John Fieldsend
Special Counsel
Office of Rulemaking
Division of Corporation Finance
U.S. Securities and Exchange Commission

Date: July 20, 2011

Re: Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act Regarding Congolese Conflict Minerals

On July 20, 2011, SEC Deputy Chief of Staff James R. Burns, Division of Corporation Finance Director Meredith Cross, and Division of Corporation Finance Deputy Director Paula Dubberly, met with Toni Harrington of Honda, Colin A. Stackhouse of Siemens Corporation, Bob Shepler of Lockheed Martin, Douglas E. Perry of Honeywell, James W. Stephenson and David Drapkin of Northrop Grumman Corporation, Kirsten M. Koepsel and Irene Ripley of the Aerospace Industries Association, Catherine Boland of the Motor & Equipment Manufacturers Association, William Morin of Applied Materials, Inc., Clay Thompson of Caterpillar, Jeremy O. Preiss of United Technologies Corporation, Benedict S. Cohen of The Boeing Company, Frank Vargo and Stephen P. Jacobs of the National Association of Manufacturers, and Fern Abrams of IPC. The participants discussed the Commission's implementation of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which relates to reporting requirements regarding conflict minerals originating in the Democratic Republic of the Congo and adjoining countries.

The outside meeting participants provided hard copies of the following materials, which are all available online:

- Comment Letter (not including the appendices): Fern Abrams, IPC – Association Connecting Electronics Industries (Mar. 2, 2011), available at <http://www.sec.gov/comments/s7-40-10/s74010-131.pdf>
- Comment Letter: Thomas W. White, WilmerHale on behalf of IPC – Association Connecting Electronics Industries (Jun. 2, 2011), available at <http://www.sec.gov/comments/s7-40-10/s74010-257.pdf>
- Article: Michael J. Kavanagh, *Congo Tin Sales Tumble 90 Percent as Companies Avoid 'Conflict Minerals,'* BLOOMBERG, May 23, 2011, available at <http://www.bloomberg.com/news/2011-05-23/congo-tin-sales-tumble-90-percent-as-companies-avoid-conflict-minerals-.html>.

- Document: *iTSCi Overview: Status & Budgets*, published by iTSCi, ITRI, and TIC (June 2011, v3), available at http://www.eicc.info/documents/Extractives%20Supply%20Chain%20Workshop%20VI/Handouts/iTSCi%20overview%20results%200511_v3.pdf.
- Select Portions of Document: Pages 10, 15-16, 20-23, 48, 50-55, 76, 93, and 122 of a PowerPoint presentation held in Arlington, VA entitled, “EICC and GeSI Extractives Supply Chain Workshop VI,” (June 21, 2011), available at <http://www.eicc.info/documents/Extractives%20Supply%20Chain%20Workshop%20VI/Presentations/Extractives%20Supply%20Chain%20Workshop%20VI%20Presentation%20-%20June%202011.pdf>, including the following:
 - Pages 10, 15-16, and 20-23: select slides from the section of the presentation by Silas Sinyigaya, Democracy and Good Governance Programme Officer of the International Conference on the Great Lakes Region (ICGLR), entitled *Regional Initiative on Illegal Exploitation of Natural Resource: A view from the ground*.
 - Pages 48 and 50-55: select slides from the section of the presentation by Kay Nimmo, Manager of Sustainability and Regulatory Affairs of ITRI Ltd., entitled *iTSCi status of implementation ‘conflict minerals’ traceability and due diligence*.
 - Pages 76 and 93: select slides from the section of the presentation by Paul Mabolia Yenga, Ministere des Mines of the Democratic Republic of the Congo, Coordonnateur National, Promines Chairman of the Steering Committee ICGLR, entitled *Current Situation in DRC*.
 - Page 122: chart entitled *Conflict Free Smelter Program – Status*.