

MEMORANDUM

To: File No. S7-40-10

From: Felicia H. Kung
Chief, Office of Rulemaking
Division of Corporation Finance
U.S. Securities and Exchange Commission

Date: December 9, 2011

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

On December 9, 2011, SEC Deputy Chief of Staff Jim Burns and Felicia Kung of the Division of Corporation Finance met with Daniel F. Persico of KEMET Corporation and Paolo Mastrangelo of Holland & Knight. The participants discussed the Commission's required rulemaking under 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.