

MEMORANDUM

To: File

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

Date: July 18, 2012

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

On July 18, 2012, Meredith Cross, Paula Dubberly, Felicia Kung, and John Fieldsend of the Division of Corporation Finance met with Benedict S. Cohen of The Boeing Company, Bob Shepler of Lockheed Martin Corporation, Catherine Boland of the Motor & Equipment Manufacturers Association, Jeremy O. Preiss of United Technologies Corporation, Jessica Lemos of the National Association of Manufacturers, Fern Abrams of IPC, John Arnett of the Copper and Brass Fabricators Council, Jennifer Diggins of NUCOR Corp., Tim Fenton of Thermo Fisher Scientific, Shawn Ferguson of Kennametal Inc., Luke Harms of Whirlpool Corp., Tom Quaadman and Scott Eisner of the U.S. Chamber of Commerce, Paul Hamilton of Schneider Electric, Susan Phillips of Kimberly-Clark Corporation, Greg Barksdale and Michele Blair of TE Connectivity, Taylor Davis of John Deere, Edwin Egee of Xerox Corp., and Colin A. Stackhouse of Siemens. 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.