

MEMORANDUM

To: File

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

Date: July 24, 2012

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

On July 24, 2012, Chairman Mary L. Schapiro and Meredith Cross and Paula Dubberly of the Division of Corporation Finance met with W. James McNerney, Jr., Benedict S. Cohen, and Timothy Keating of The Boeing Company. The participants discussed their views regarding the 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.