M E M O R A N D U M

To : File No. S7-42-10 (Disclosure of Payments by Resource Extraction Issuers)

From: Tamara Brightwell

Senior Special Counsel

Division of Corporation Finance

U.S. Securities and Exchange Commission

Re : Meeting with Representatives of PWYP U.S., PWYP Ghana, Oxfam America,

and the Public Finance Monitoring Centre

Date: July 22, 2011

On July 15, 2011, Tamara Brightwell, Eduardo Aleman, and Elliot Staffin of the Division of Corporation Finance met Isabel Munilla of Publish What You Pay U.S., Ian Gary of Oxfam America, Mohammed Amin Adam of Publish What You Pay Ghana, and Ingilab Ahmadov of the Public Finance Monitoring Centre, Azerbaijan. The participants discussed the Commission's proposal to implement Section 1504 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.