

Memorandum

To: File No. S7-42-10

From: Kayla J. Gillan, Deputy Chief of Staff
Office of the Chairman

Date: January 7, 2011

Re: Disclosure of Payments by Resource Extractive Issuers

On January 5, 2011, I met with representatives from a group of organizations that are members of the Publish What you Pay (U.S.) coalition. Specifically, I met with Isabel Munilla, Director of Publish What You Pay (U.S.); Rees Warne, Policy Advisor for Extractive Industries, Catholic Relief Services; Heather Lowe, Legal Counsel and Director of Government Affairs, Global Financial Integrity; Corinna Gilfillan, Head of U.S. Office, Global Witness; and Mathew Genasci, Legal Advisor, Revenue Watch Institute. The group wanted to discuss the Commission's Release No. 34-63549, concerning Disclosure of Payments by Resource Extractive Issuers.

I explained that Chairman Schapiro is recused from participating in this matter, and that this recusal extends to me (as a member of the Chairman's staff) with regard to any questions other than merely procedural. I then responded to a few procedural questions (e.g., in general, how long does it take between rule proposals and adoption? Do Commissioners review comments, and how is information about comments conveyed to Commissioners?).