

## MEMORANDUM

**TO:** File S7-09-05

**FROM:** Marlon Quintanilla Paz  
Division of Market Regulation

**DATE:** January 19, 2006

**RE:** Client Commission Practices Under Section 28(e); File No. S7-09-05  
Meeting with the Investment Adviser Association

---

On December 19, 2005, members from the Division of Market Regulation met with Karen Barr and Monique Botkin of the Investment Adviser Association and David Oestreicher of T. Rowe Price to discuss their comments on the proposed Commission guidance regarding client commission practices under Section 28(e) of the Securities Exchange Act of 1934. Topics discussed included: products and services subject to a “mixed-use” allocation; cross-border harmonization; and aspects of commission-sharing arrangements under which research and brokerage services are provided under Section 28(e).