

**Communication Between Federal Reserve Staff  
and a Representative of Sullivan & Cromwell (“S&C”)  
February 1, 2011**

**Participants:** Pam Nardolilli (Federal Reserve Board)

Virgil Mattingly (S&C)

**Summary:** A representative of S&C contacted Federal Reserve staff to discuss the status of the revisions to Regulation W required under Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank”).

As part of this discussion, S&C’s representative discussed the calculation of reverse repurchase agreements under Regulation W after the changes imposed by Dodd-Frank. The representative also highlighted the language in sections 610 and 611 of Dodd-Frank regarding the inclusion of “credit exposure” arising from reverse repurchase agreements. S&C’s representative recommended coordination between the sections may be helpful, even though section 608 does not limit the transaction to credit exposure.

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