

Memorandum

To: File No. 4-483

From: Kevin O'Neill
Division of Corporation Finance

Re: Meeting with Members of Community Bankers Council of
American Bankers Association

On October 23, 2006, representatives from the Division of Corporation Finance and the Office of Chief Accountant met with members of the Community Bankers Council of the American Bankers Association and other personnel from that organization and discussed the Public Petition for Rulemaking Under Section 12(g)(5) of the Securities Exchange Act of 1934 Concerning Securities Held in "Street Name."