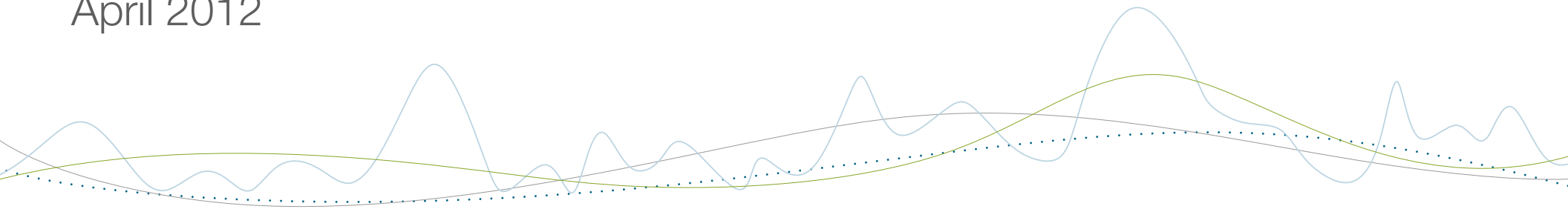


Dodd-Frank **Progress Report**

April 2012



In Brief: March 2012

- **No New Deadlines.** No deadlines have passed this month.
- **1 Requirement Met.** The NCUA approved a final rule establishing the responsibilities of the NCUA's Office of Minority and Women Inclusion.
- **No Studies.** No studies were released this month.

State of Play to Date:

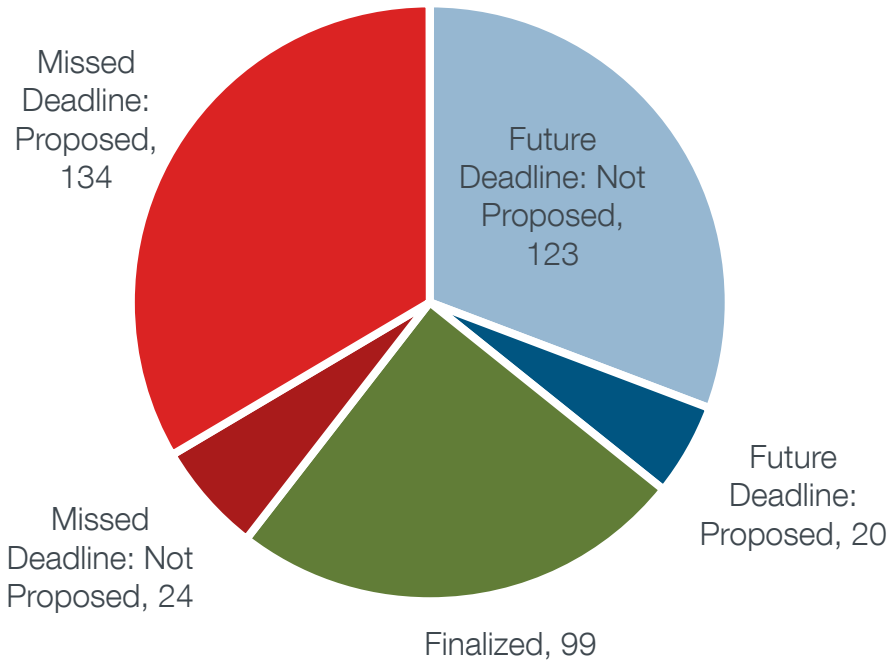
- As of April 2, 2012, a total of 222 Dodd-Frank rulemaking requirement deadlines have passed. This is 56.5% of the 393 total rulemaking requirements, and 78.4% of the 283 rulemaking requirements with specified deadlines.
- Of these 222 passed deadlines, 155 (69.8%) have been missed and 67 (30.2%) have been met with finalized rules. Regulators have not yet released proposals for 21 of the 155 missed rules.
- Of the 393 total rulemaking requirements, 100 (25.5%) have been met with finalized rules and rules have been proposed that would meet 155 (39.4%) more. Rules have not yet been proposed to meet 138 (35.1%) rulemaking requirements.

Contents

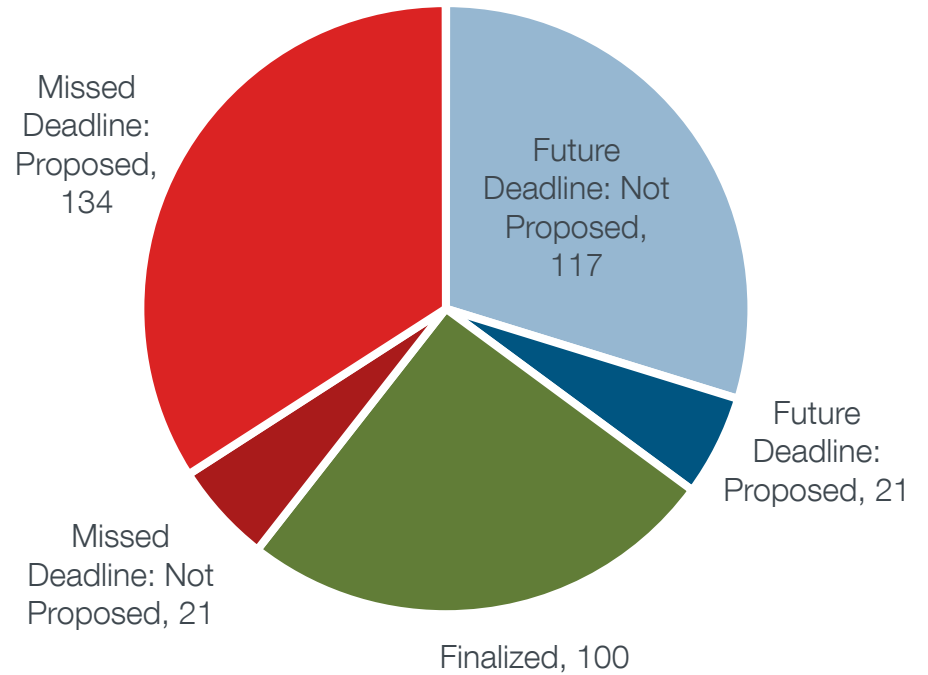
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Dodd-Frank Rulemaking Progress by Month

As of March 1, 2012



As of April 2, 2012

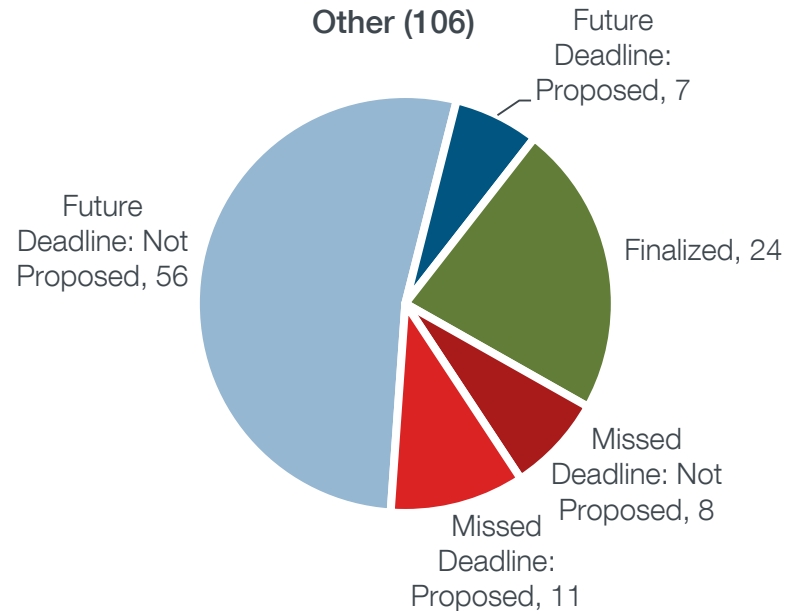
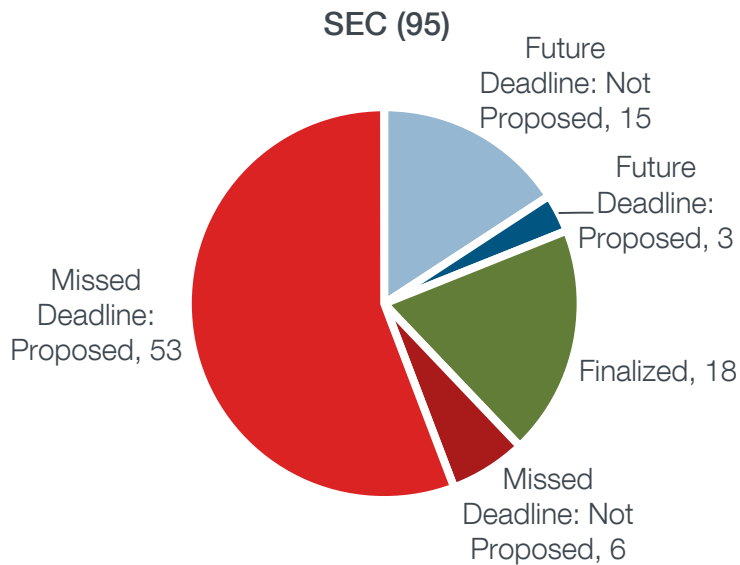
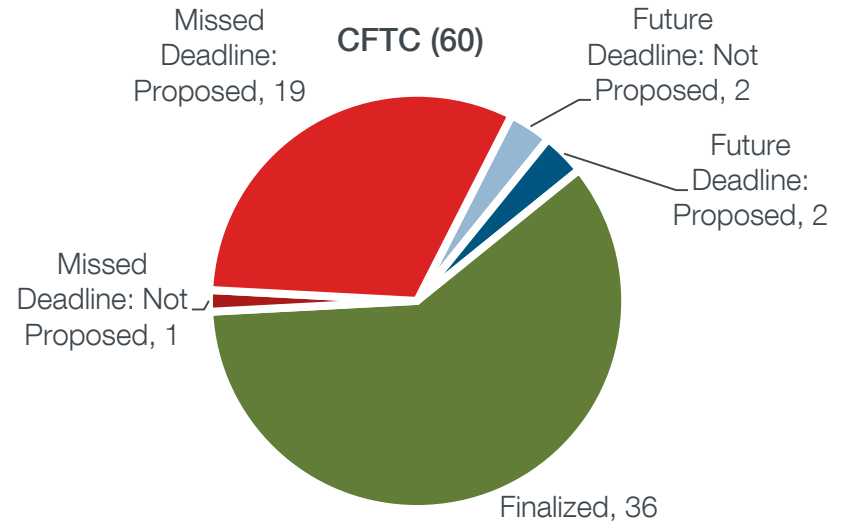
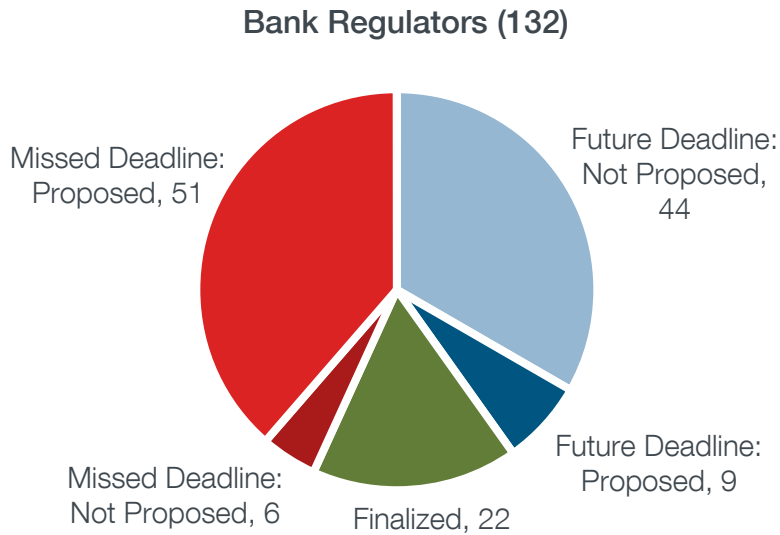


Rulemaking counts are based on estimates and require judgment.

Values Refer to Number of Rulemaking Requirements

Dodd-Frank Rulemaking Progress by Agency

As of April 2, 2012

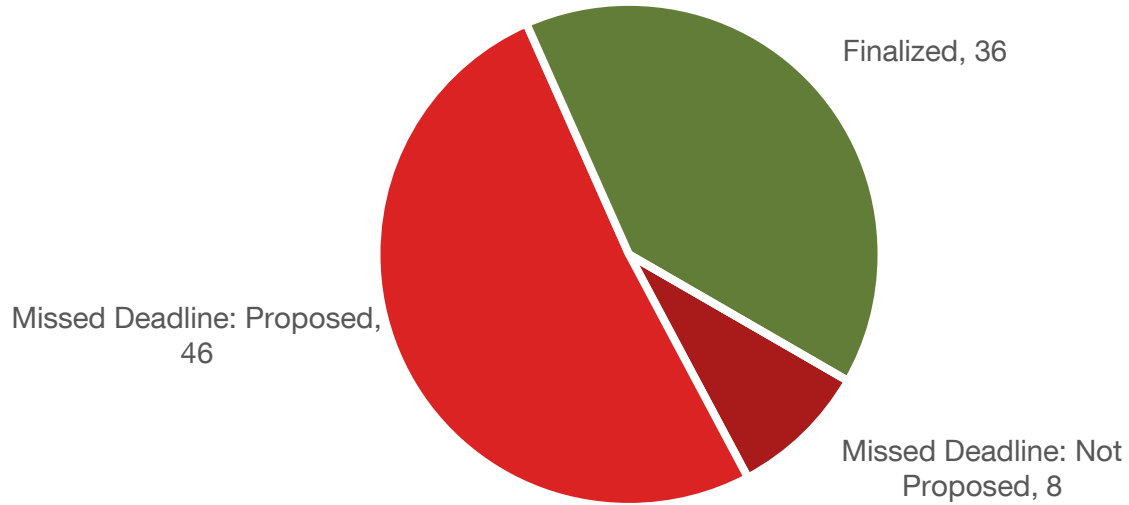


Rulemaking counts are based on estimates and require judgment.

Values Refer to Number of Rulemaking Requirements

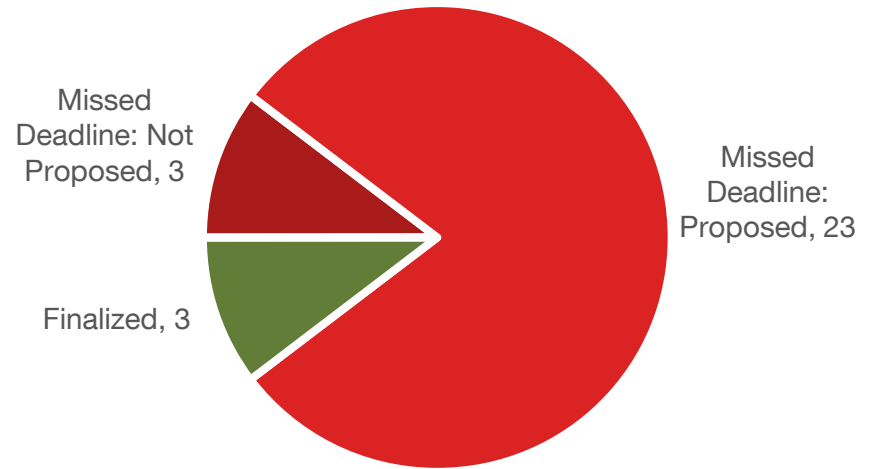
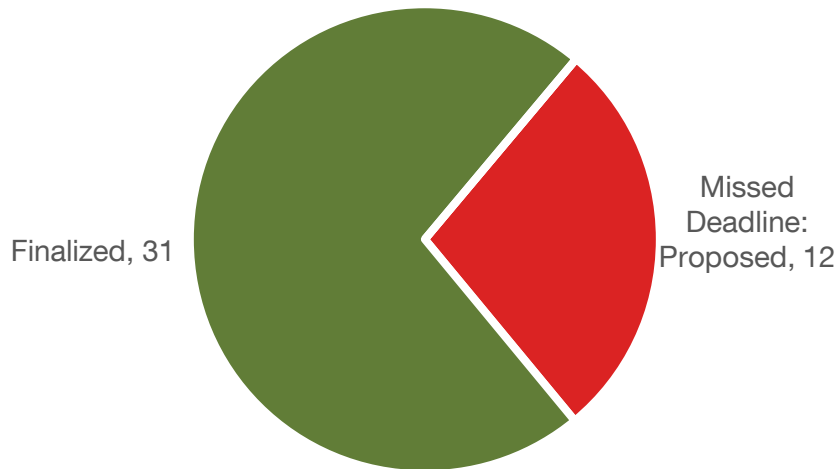
Title VII Progress on Required Rulemakings

As of April 2, 2012



CFTC Progress on Required Title VII Rulemakings

SEC Progress on Required Title VII Rulemakings

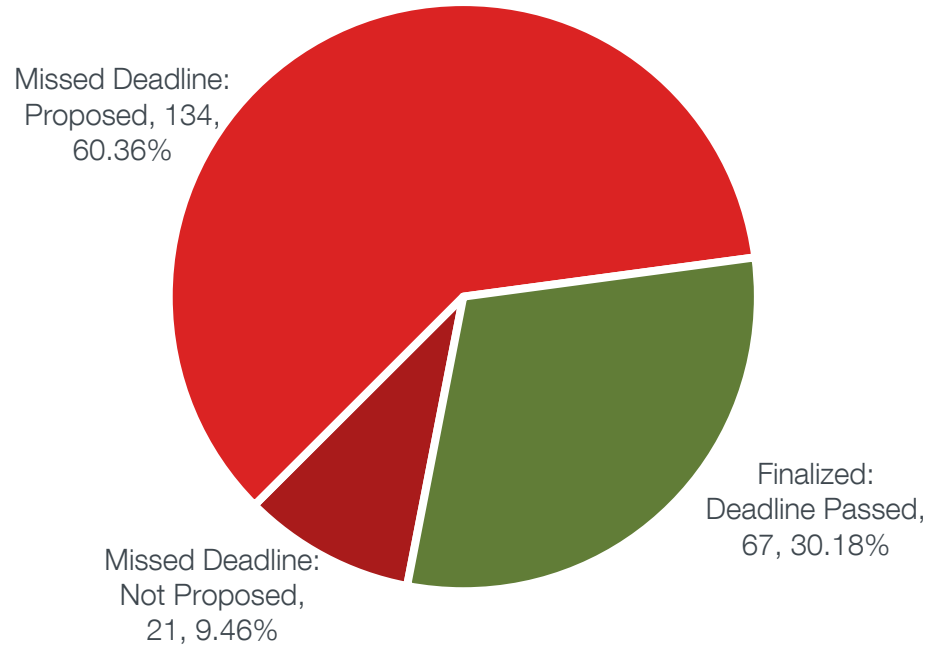


Note: Total pie chart includes requirements from the CFTC, SEC and other regulators with rulemaking requirements under Title VII.

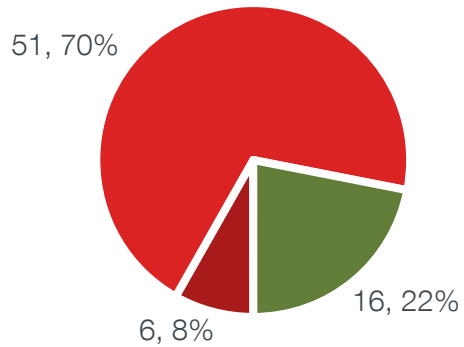
Dodd-Frank Rulemaking Progress on Passed Deadlines

As of April 2, 2012

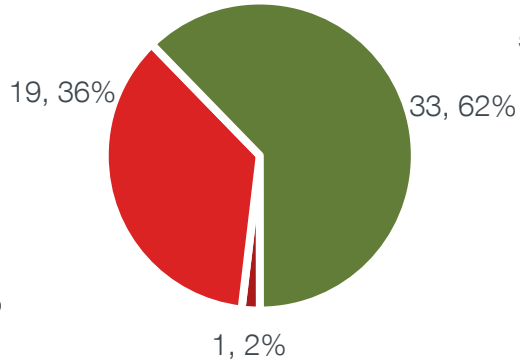
Total (222)



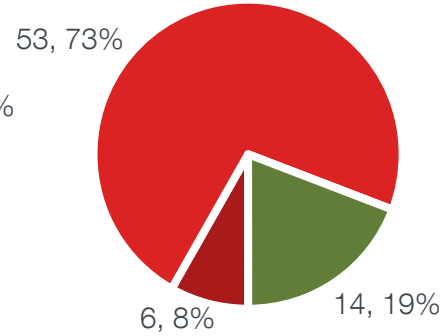
Bank Regulators (73)



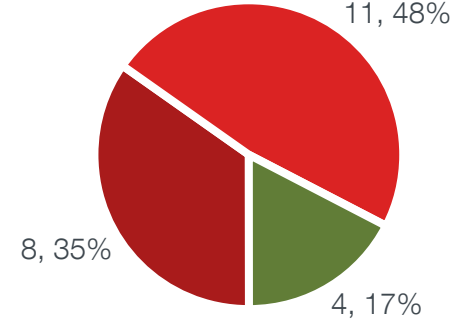
CFTC (53)



SEC (73)



Other (23)

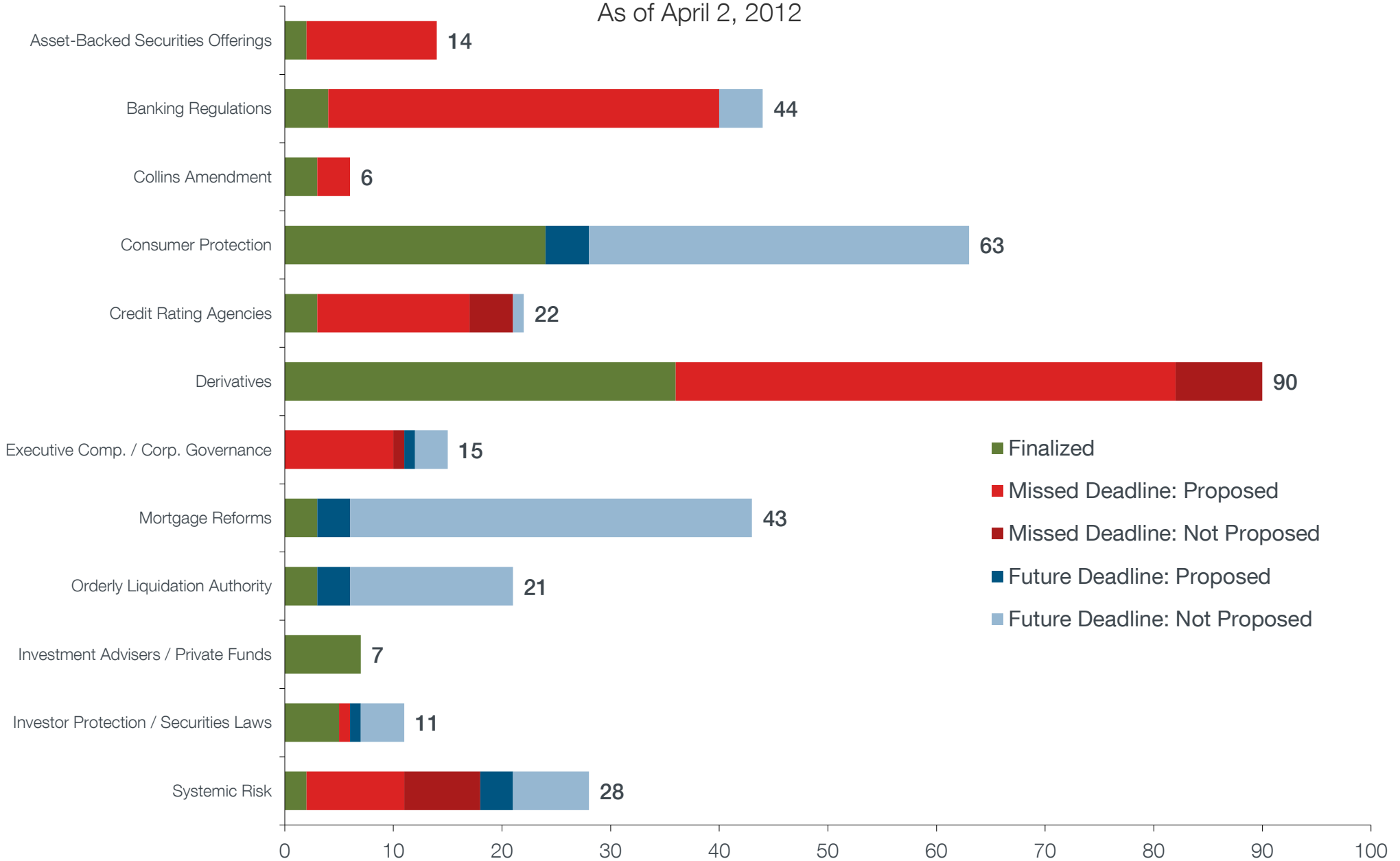


Rulemaking counts are based on estimates and require judgment.

Values Refer to Number of Rulemaking Requirements

Dodd-Frank Rulemaking Progress in Select Categories

As of April 2, 2012

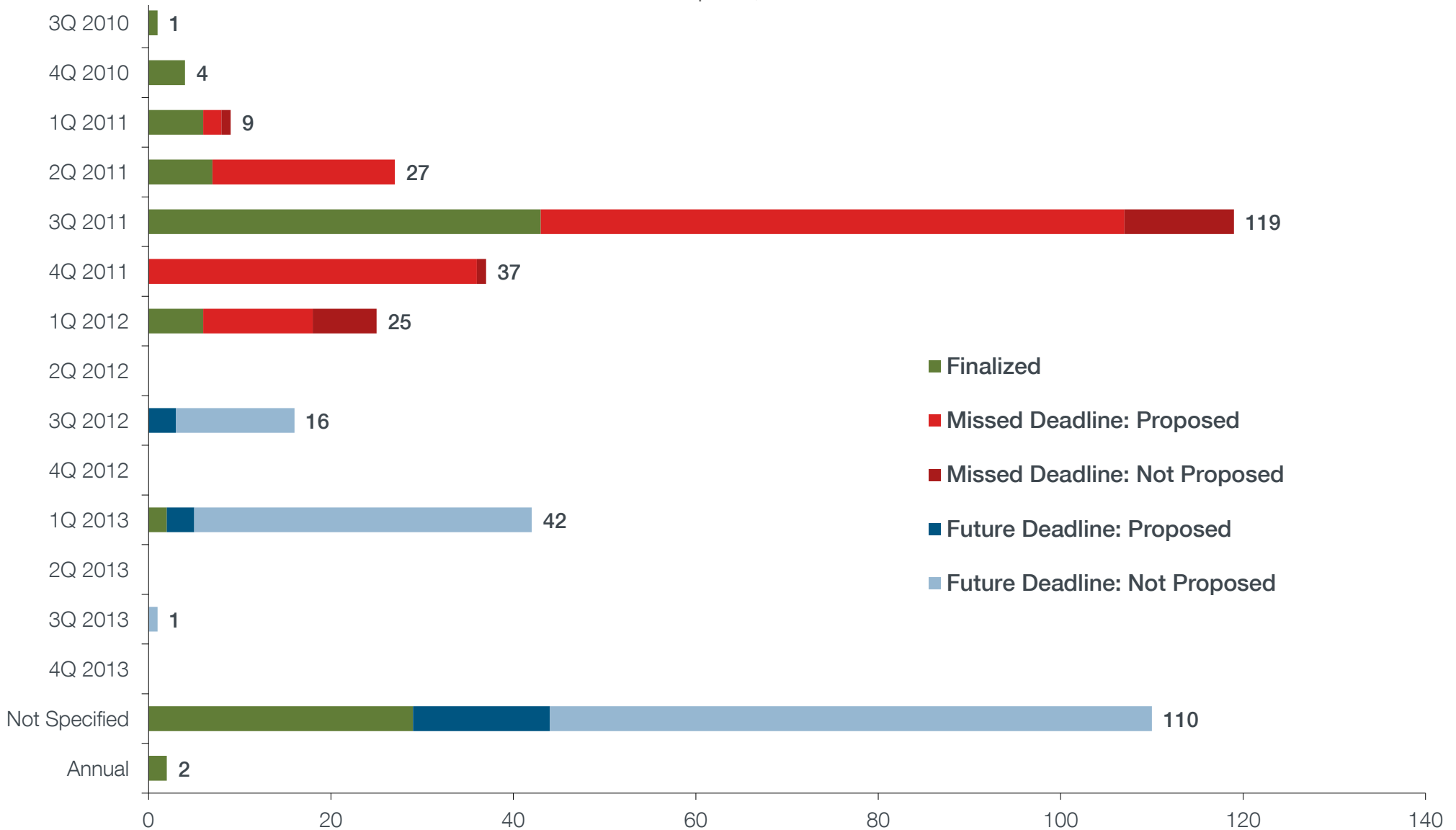


Rulemaking counts are based on estimates and require judgment.

Number of Required Rulemakings
(Joint Rules are Counted for Each Applicable Agency)

Dodd-Frank Rulemaking Progress by Due Date

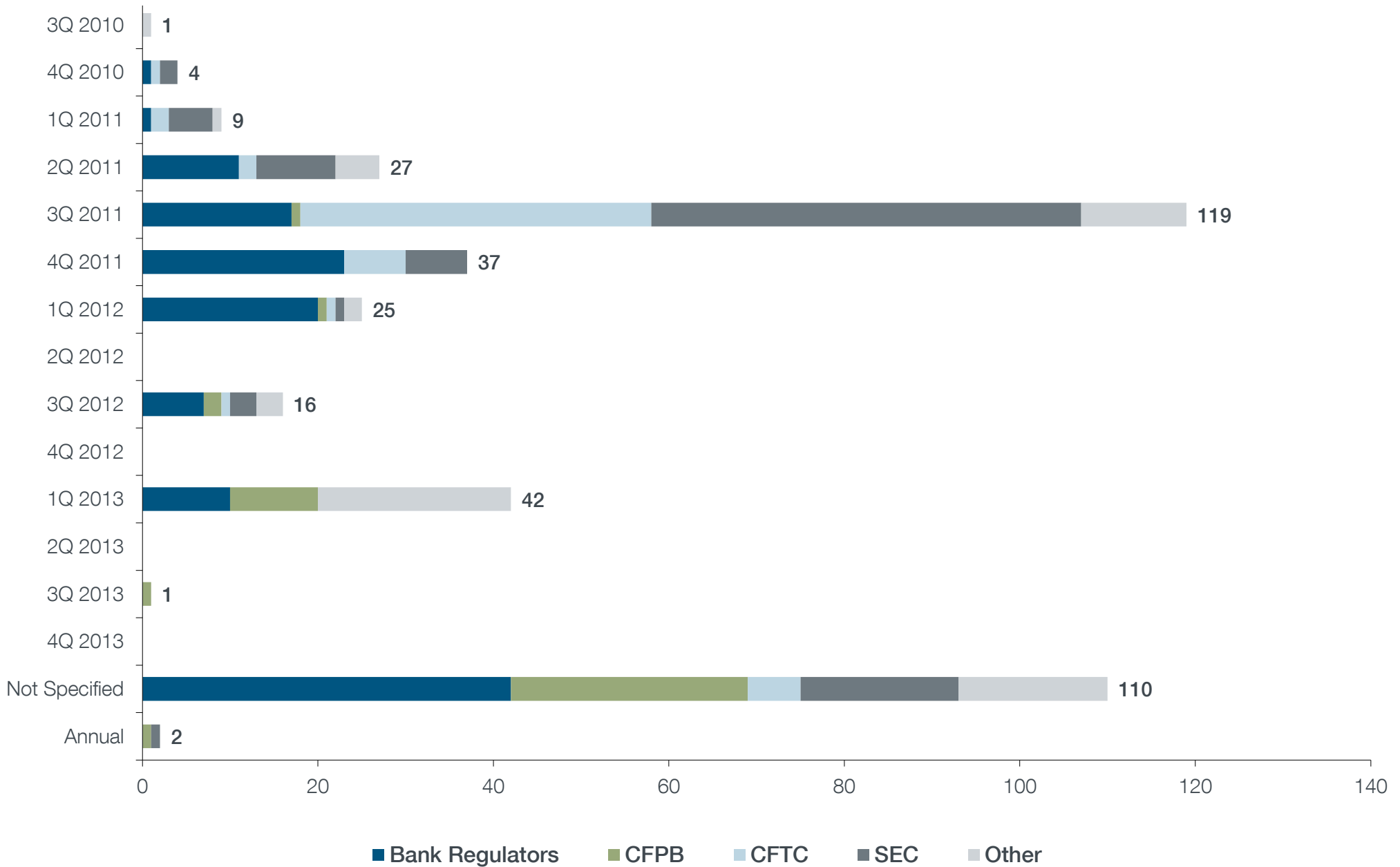
As of April 2, 2012



Rulemaking counts are based on estimates and require judgment.

Number of Required Rulemakings
(Joint Rules are Counted for Each Applicable Agency)

Dodd-Frank Statutory Deadlines for Required Rulemakings

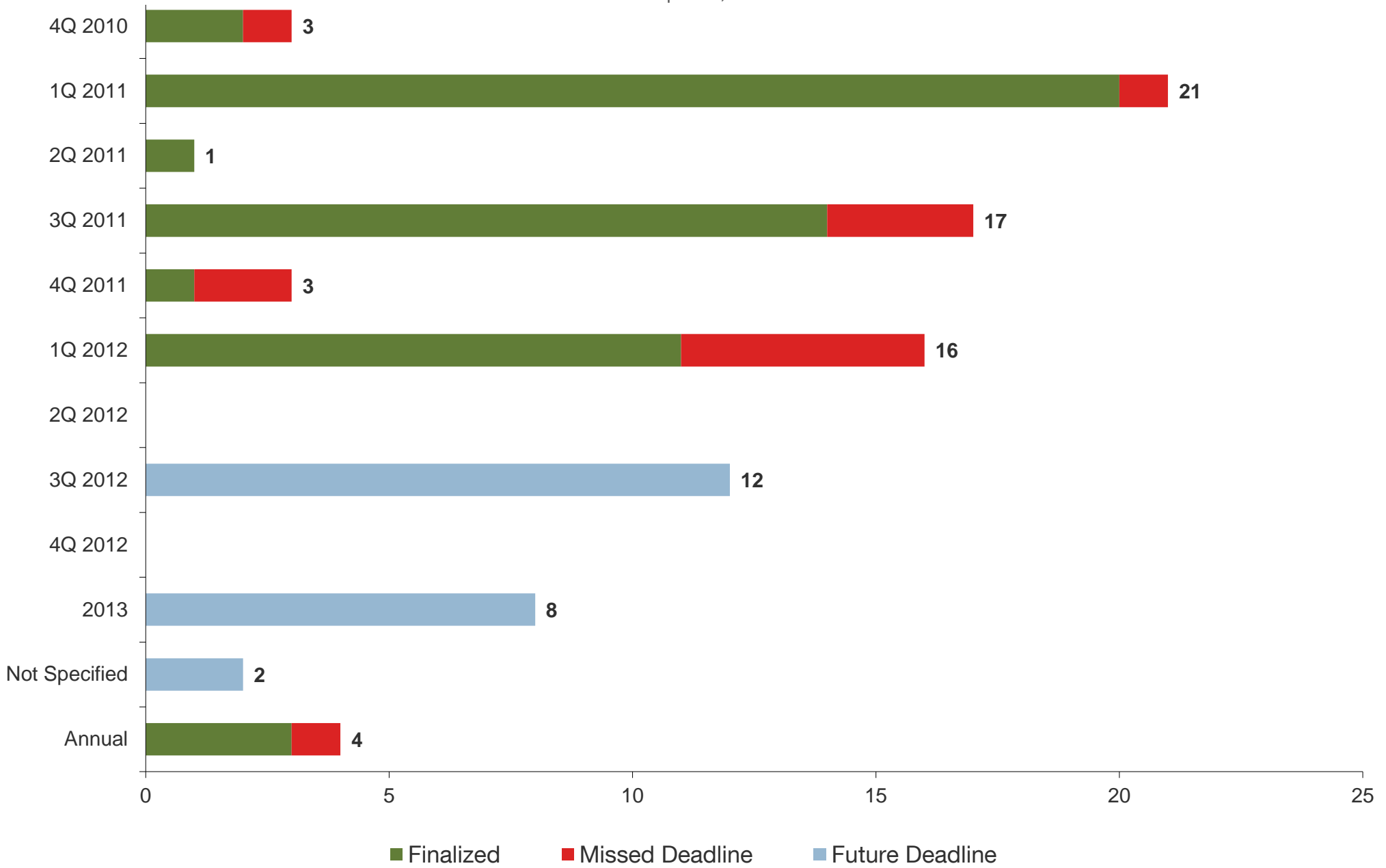


Rulemaking counts are based on estimates and require judgment.

Number of Required Rulemakings
(Joint Rules are Counted for Each Applicable Agency)

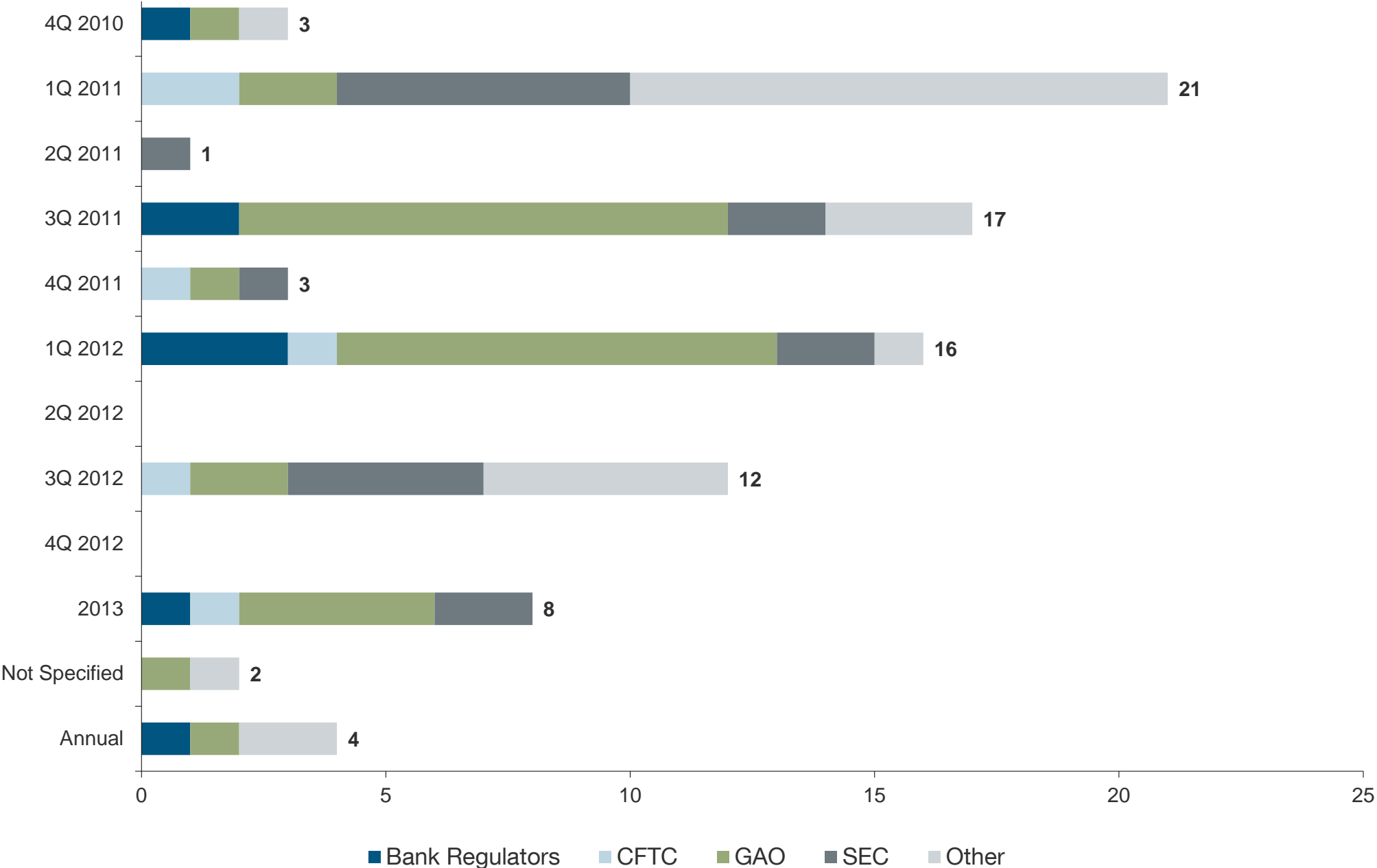
Dodd-Frank Study Progress by Due Date

As of April 2, 2012



Number of Required Studies
(Joint Studies are Counted for Each Applicable Agency)

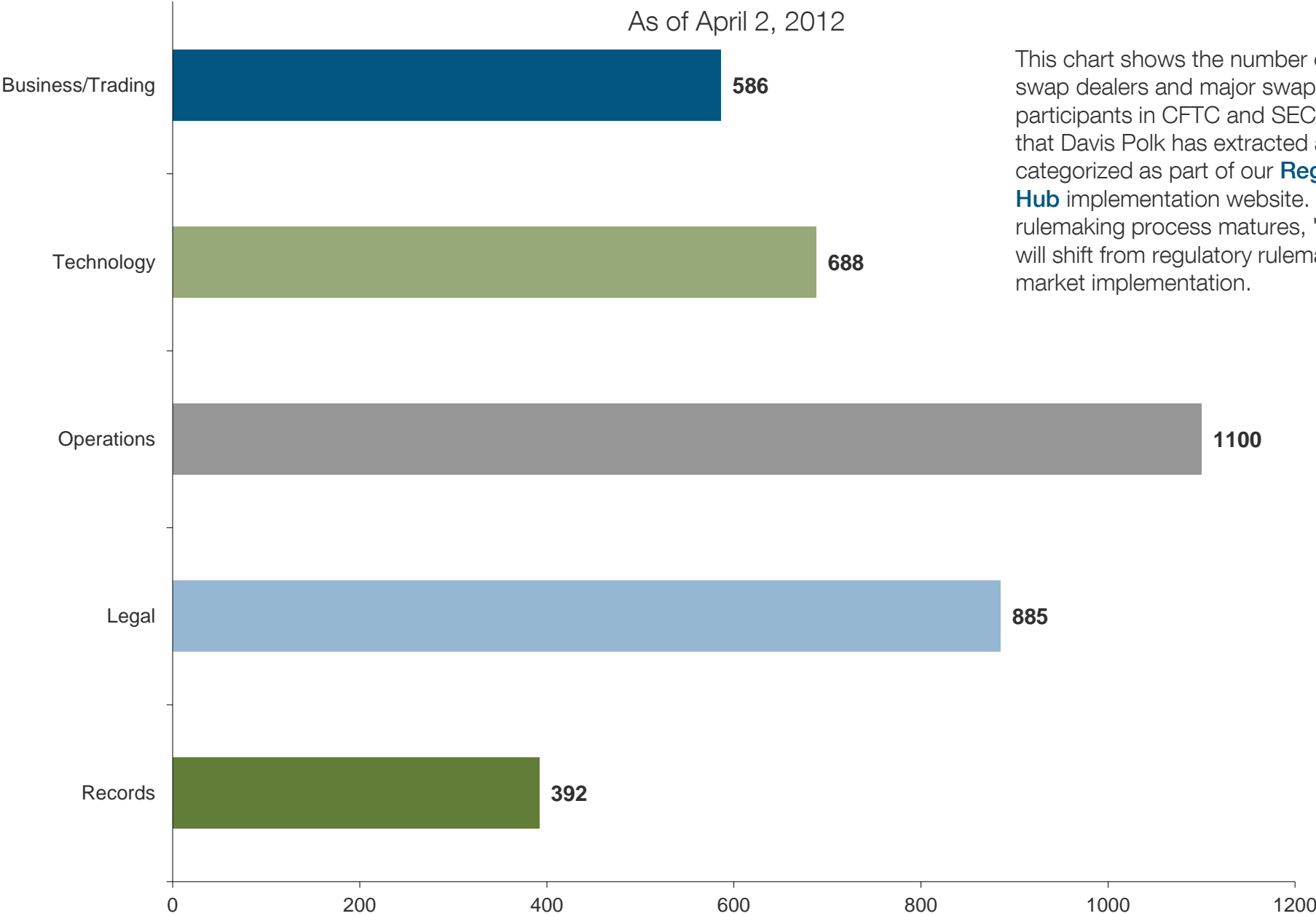
Dodd-Frank Statutory Deadlines for Required Studies



Number of Required Studies
(Joint Studies are Counted for Each Applicable Agency)

Tasks for Swap Dealers and Major Swap Participants

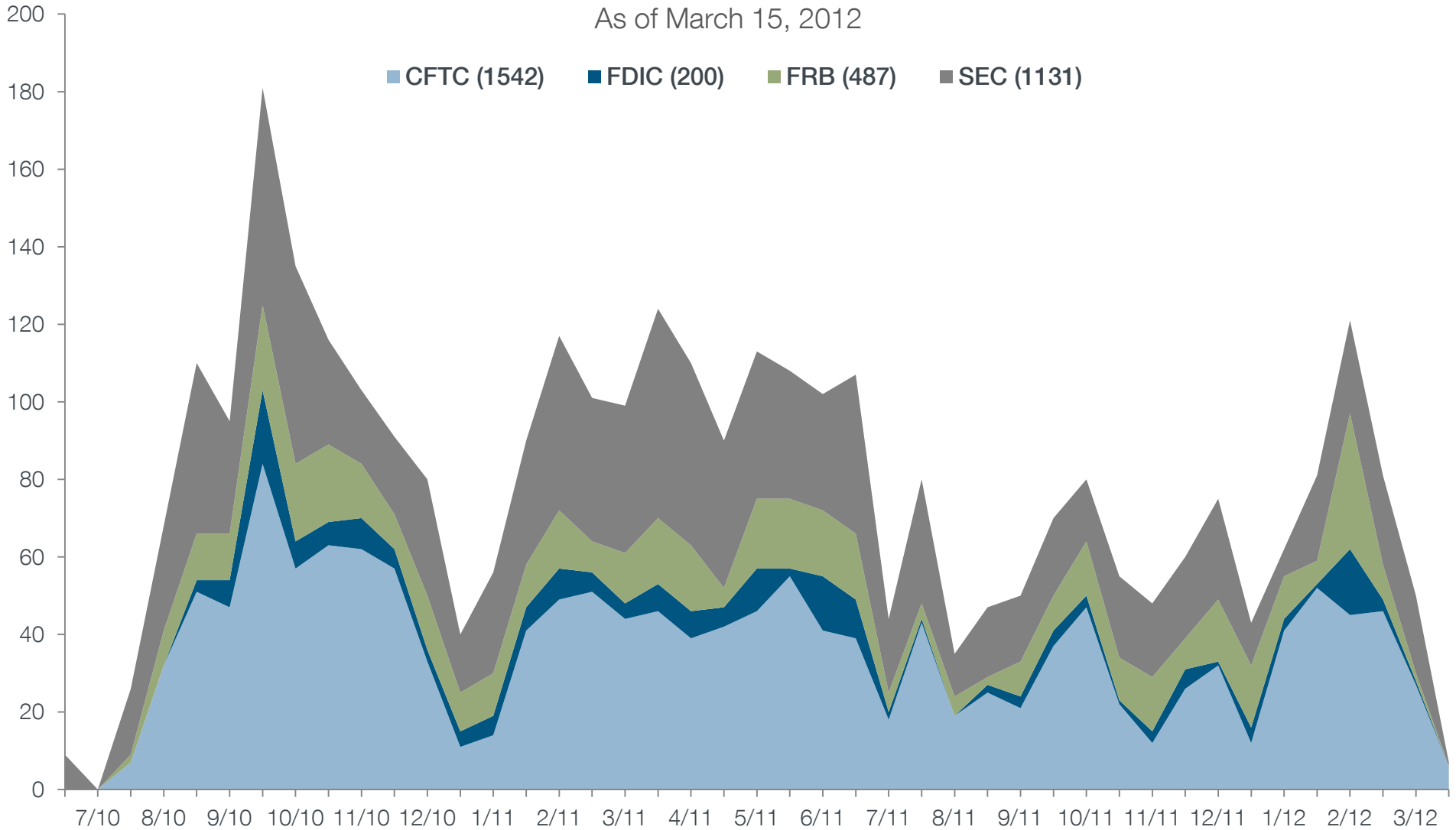
As of April 2, 2012



This chart shows the number of tasks for swap dealers and major swap participants in CFTC and SEC releases that Davis Polk has extracted and categorized as part of our **Regulatory Hub** implementation website. As the rulemaking process matures, "progress" will shift from regulatory rulemaking to market implementation.

Regulator Meetings with Outside Participants Over Time

As of March 15, 2012



In the spirit of transparency, several financial regulators have released details of their meetings with outside participants on Dodd-Frank issues. Based on the information available, there have been at least 2800 meetings with these regulators since July 1, 2010. Joint meetings (of which there were more than 200) are counted separately for each participating regulator.

About the Progress Report

- The Davis Polk Dodd-Frank Progress Report is a monthly publication that uses empirical data to help market participants and policymakers assess the progress of the rulemaking and other work that has been done by regulators under the Dodd-Frank Act.

[Access previous reports on our website.](#)

- The Progress Report was developed using information from Davis Polk's subscription-based Regulatory Tracker™ product. For more information on the Regulatory Tracker, please contact **tracker@davispolk.com** or **[view our brochure.](#)**
- Required, proposed, final and missed rulemakings and studies are counted based on Davis Polk's tally of statutory requirements in the Davis Polk Regulatory Tracker™. An agency's rule release may satisfy several statutorily required rulemakings.
- Where multiple agencies are required to issue a rule or study jointly, the requirement appears in each of their totals, which we believe most accurately reflects the staff burden on regulatory agencies.
- The term *Bank Regulators* includes the Board of Governors of the Federal Reserve, the FDIC and the OCC.

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For more information regarding the Progress Report, please contact dodd.frank.progress.report@davispolk.com.

For more information regarding the Davis Polk Regulatory Tracker™, please contact tracker@davispolk.com.

Questions?

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