2 Requirements Met. The SEC adopted a final rule requiring U.S. public companies to disclose the ratio of their CEO’s compensation to that of their median employee. The SEC also adopted a final rule and associated forms for the registration of security-based swap dealers and major security-based swap participants.

State of Play to Date:

- As of September 30, 2015, 271 rulemaking deadlines have passed. Of the 271 rulemaking requirements with deadlines that have passed, 193 (71.2%) have been met with finalized rules and rules have been proposed that would meet 45 (16.6%) more. Rules have not yet been proposed to meet 33 (12.2%) passed rulemaking requirements.

- Of the 390 total rulemaking requirements, 249 (63.8%) have been met with finalized rules and rules have been proposed that would meet 58 (14.9%) more. Rules have not yet been proposed to meet 83 (21.3%) rulemaking requirements.
Contents

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As of July 15, 2015

- Missed Deadline: Not Proposed, 33
- Missed Deadline: Proposed, 46
- Future Deadline: Proposed, 14

Finalized, 247

As of September 30, 2015

- Missed Deadline: Proposed, 13
- Missed Deadline: Proposed, 45
- Future Deadline: Not Proposed, 50

Finalized, 249

Values Refer to Number of Rulemaking Requirements

Rulemaking counts are based on estimates and require judgment.
Dodd-Frank Rulemaking Progress by Agency

As of September 30, 2015

Values Refer to Number of Rulemaking Requirements

Rulemaking counts are based on estimates and require judgment.
Dodd-Frank Rulemaking Progress
on Passed Deadlines
As of September 30, 2015

Total (271)

- Finalized: Deadline Passed, 193, 71.2%
- Missed Deadline: Proposed, 45, 16.6%
- Missed Deadline: Not Proposed, 33, 12.2%

Bank Regulators (87)
- Finalized: 67, 77%
- Missed Deadline: Proposed, 7, 13%
- Missed Deadline: Not Proposed, 13, 15%

CFTC (53)
- Finalized: 45, 85%
- Missed Deadline: Proposed, 7, 13%
- Missed Deadline: Not Proposed, 1, 2%

SEC (75)
- Finalized: 54, 72%
- Missed Deadline: Proposed, 14, 19%
- Missed Deadline: Not Proposed, 7, 9%

Other (56)
- Finalized: 11, 20%
- Missed Deadline: Proposed, 18, 32%
- Missed Deadline: Not Proposed, 27, 48%

Rulemaking counts are based on estimates and require judgment.

Values Refer to Number of Rulemaking Requirements
As of September 30, 2015

**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 September 30, 2015

Number of Required Studies
(Joint Studies are Counted for Each Applicable Agency)
The Davis Polk Dodd-Frank Progress Report is a quarterly 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.
If you have any questions regarding the matters covered in this Progress Report, please contact any of the lawyers listed below or your regular Davis Polk contact.

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