

Dodd-Frank Progress Report - May 2012

May 1, 2012 | Client Update

In this Report:

- As of May 1, 2012, a total of 221 Dodd-Frank rulemaking requirement deadlines have passed. Of these 221 passed deadlines, 148 (67%) have been missed and 73 (33%) have been met with finalized rules.
- In addition, 108 (27.1%) of the 398 total required rulemakings have been finalized, while 144 (36.2%) rulemaking requirements have not yet been proposed.
- Of particular note this month, the CFTC and SEC approved joint final rules further defining the terms “swap dealer,” “security-based swap dealer,” “major swap participant,” “major security-based swap participant” and “eligible contract participant.”

If you have any questions regarding the matters covered in this publication, please reach out to any of the lawyers listed below or your usual Davis Polk contact.

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