

## Dodd-Frank Progress Report - July 2012

July 2, 2012 | Client Update

- As of July 2, 2012, a total of 221 Dodd-Frank rulemaking requirement deadlines have passed. Of these 221 passed deadlines, 140 (63%) have been missed and 81 (37%) have been met with finalized rules.
- In addition, 119 (29.9%) of the 398 total required rulemakings have been finalized, while 142 (35.7%) rulemaking requirements have not yet been proposed.
- Major rulemaking activity this month included the FDIC, Federal Reserve and OCC joint final rule on market risk capital standards and the FDIC proposed rule on the definition of “predominantly engaged in financial activities” for purposes of Orderly Liquidation Authority. Additionally, though not explicitly required by Dodd-Frank, the CFTC released proposed interpretive guidance and a proposed order related to the cross-border application of Title VII.

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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