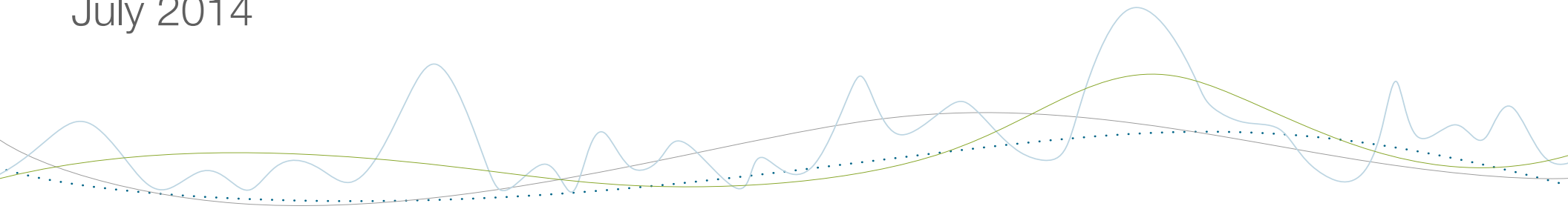


# Dodd-Frank Progress Report

July 2014



## In Brief: June 2014

- **1 Study.** The SEC released a study on the feasibility, benefits and costs of requiring real-time short sale reports and developing a voluntary reporting pilot program.
- The SEC adopted a rule that defines key Title VII cross-border terms, provides a process by which non-U.S. regulators can request that the SEC make a foreign law comparability determination and addresses the scope of the SEC's anti-fraud authority with respect to securities.

### State of Play to Date:

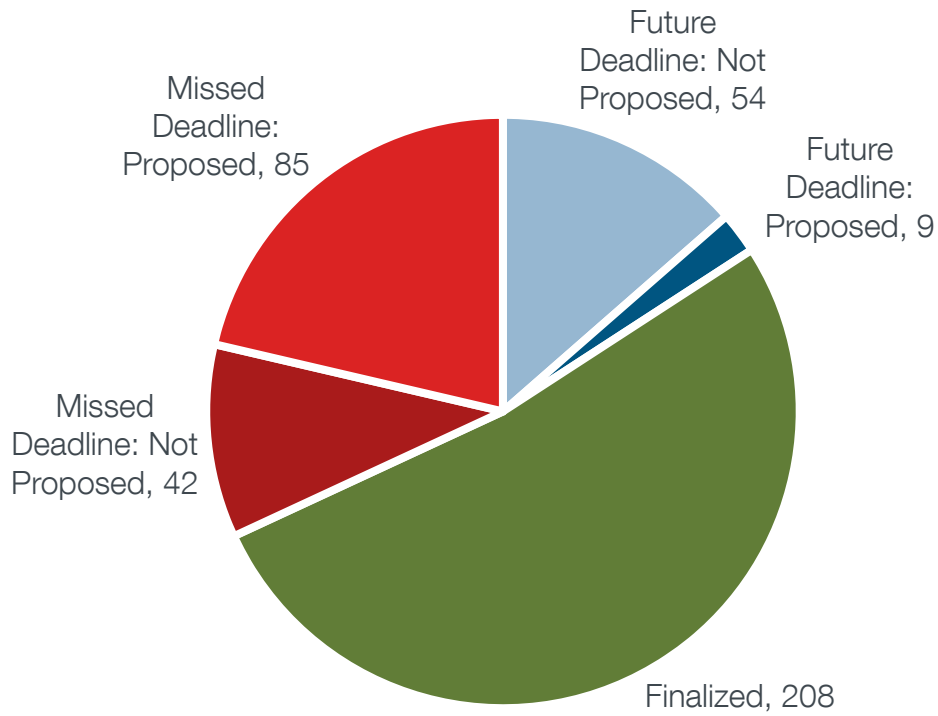
- In the past month, no rulemaking requirement deadlines passed or were met with finalized rules, and no new rules were proposed that would meet rulemaking requirements.
- As of July 1, 2014, a total of 280 Dodd-Frank rulemaking requirement deadlines have passed. This is 70.4% of the 398 total rulemaking requirements, and 100% of the 280 rulemaking requirements with specified deadlines.
- Of these 280 passed deadlines, 127 (45.4%) have been missed and 153 (54.6%) have been met with finalized rules. Regulators have not yet released proposals for 42 of the 127 missed rules.
- Of the 398 total rulemaking requirements, 208 (52.3%) have been met with finalized rules and rules have been proposed that would meet 94 (23.6%) more. Rules have not yet been proposed to meet 96 (24.1%) rulemaking requirements.

## Contents

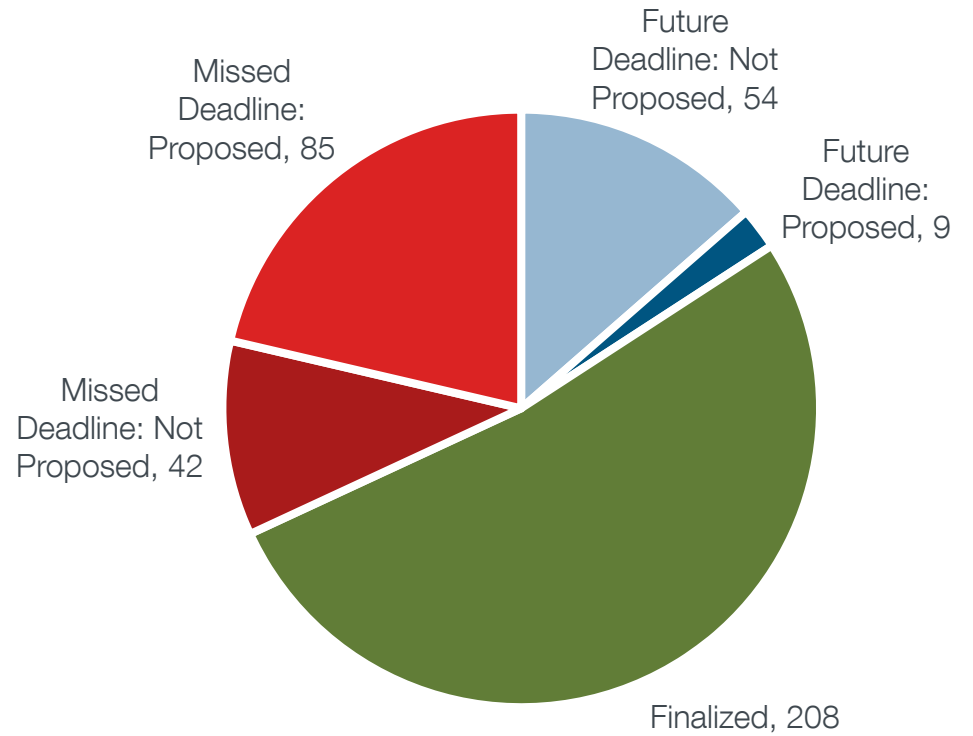
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# Dodd-Frank Rulemaking Progress by Month

**As of June 2, 2014**



**As of July 1, 2014**

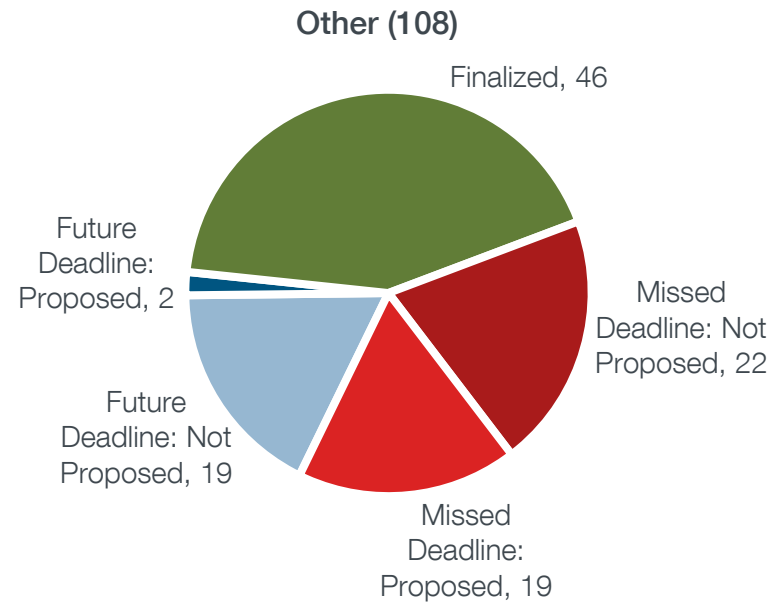
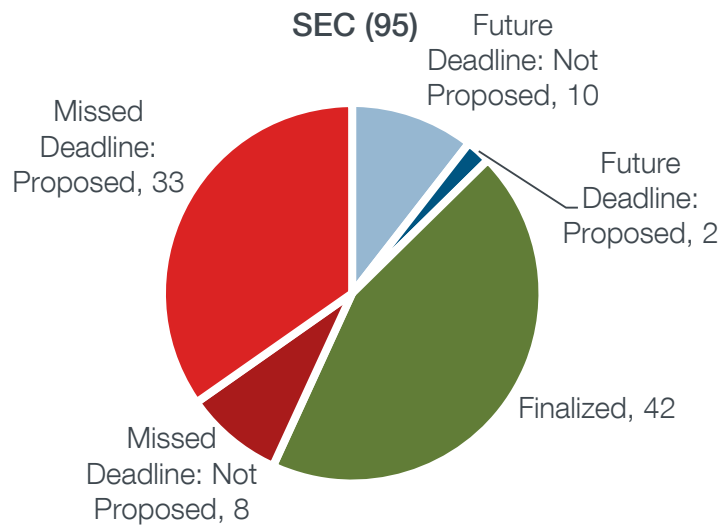
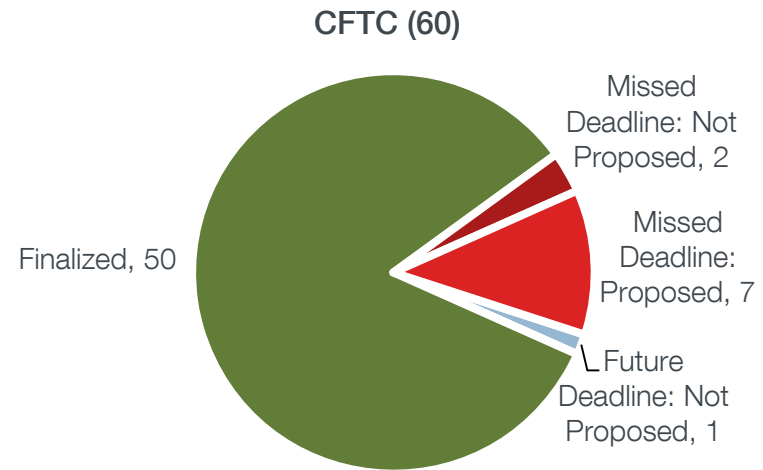
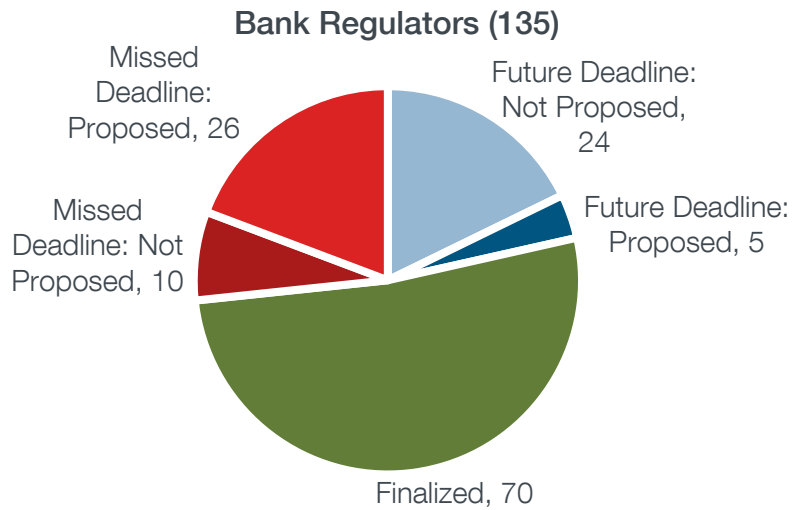


Rulemaking counts are based on estimates and require judgment.

**Values Refer to Number of Rulemaking Requirements**

# Dodd-Frank Rulemaking Progress by Agency

As of July 1, 2014

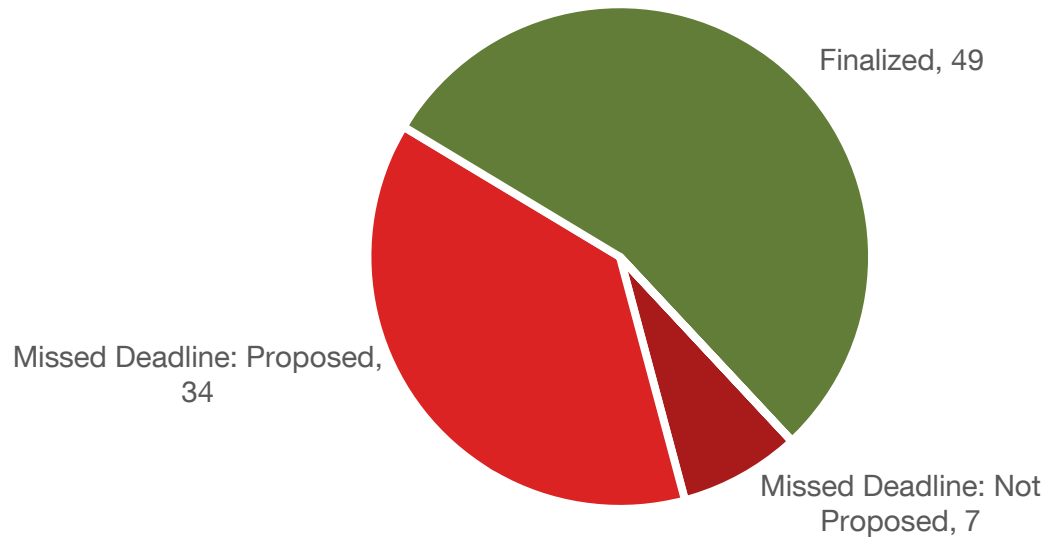


Rulemaking counts are based on estimates and require judgment.

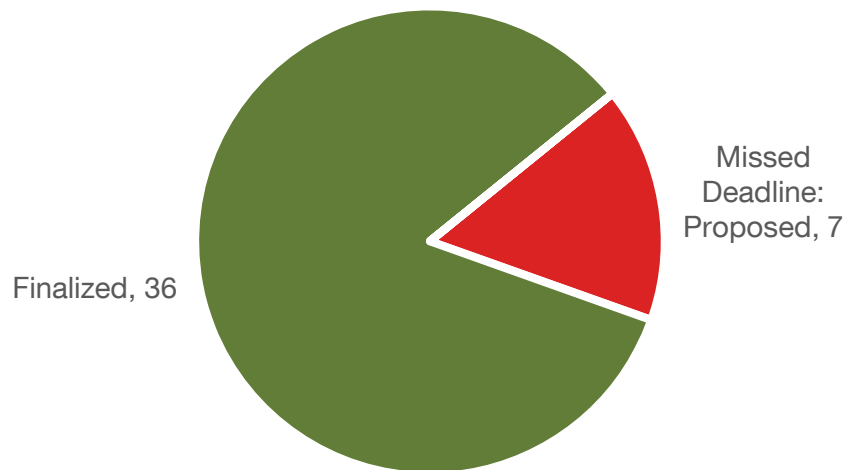
Values Refer to Number of Rulemaking Requirements

# Title VII Progress on Required Rulemakings

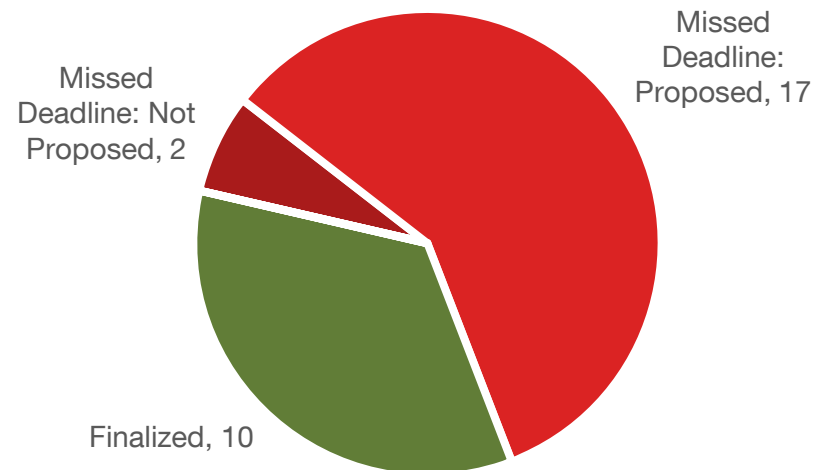
As of July 1, 2014



**CFTC Progress on Required Title VII Rulemakings**



**SEC Progress on Required Title VII Rulemakings**

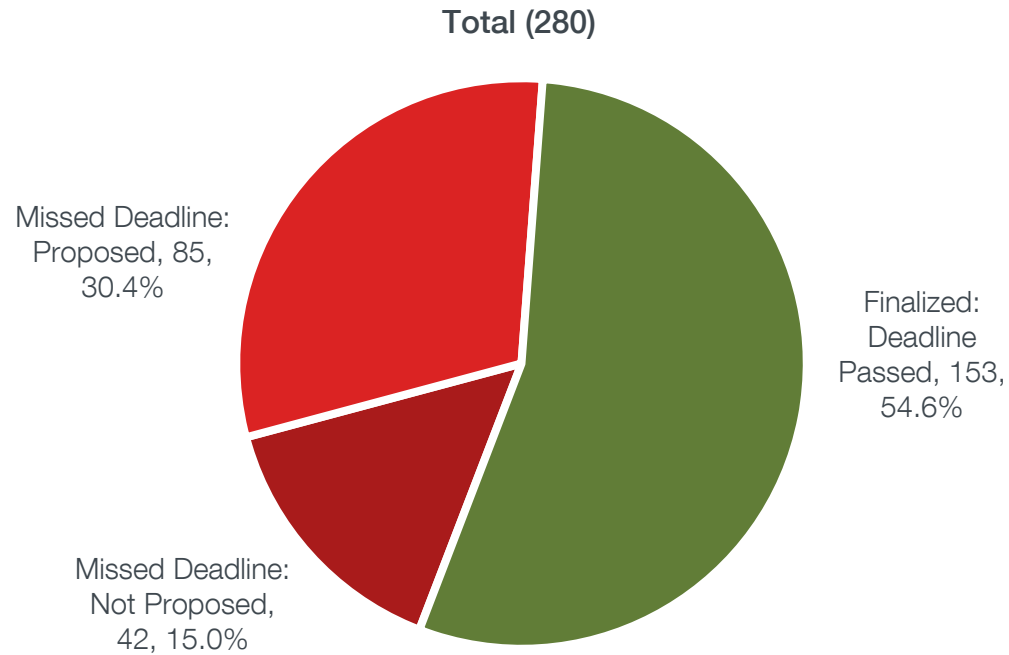


Rulemaking counts are based on estimates and require judgment.

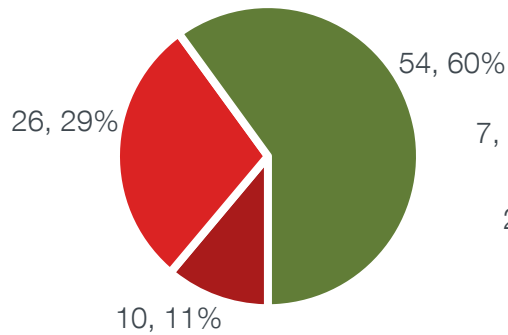
**Values Refer to Number of Rulemaking Requirements**

# Dodd-Frank Rulemaking Progress on Passed Deadlines

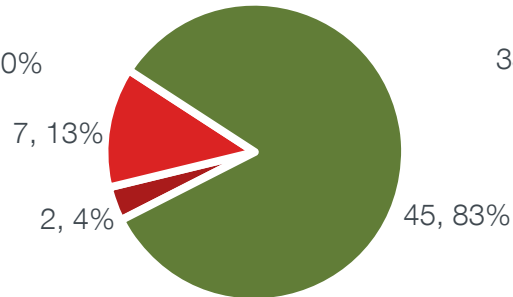
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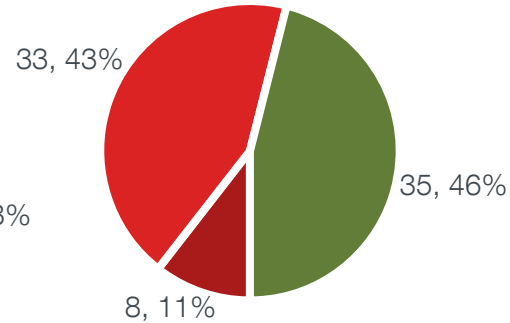
**Bank Regulators (90)**



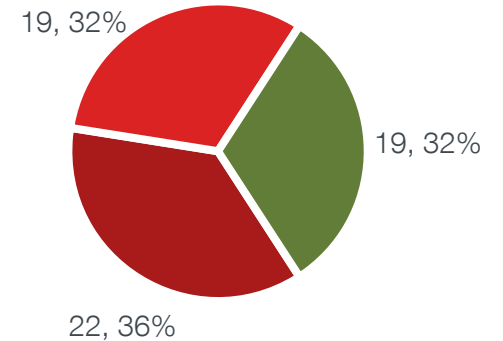
**CFTC (54)**



**SEC (76)**



**Other (60)**

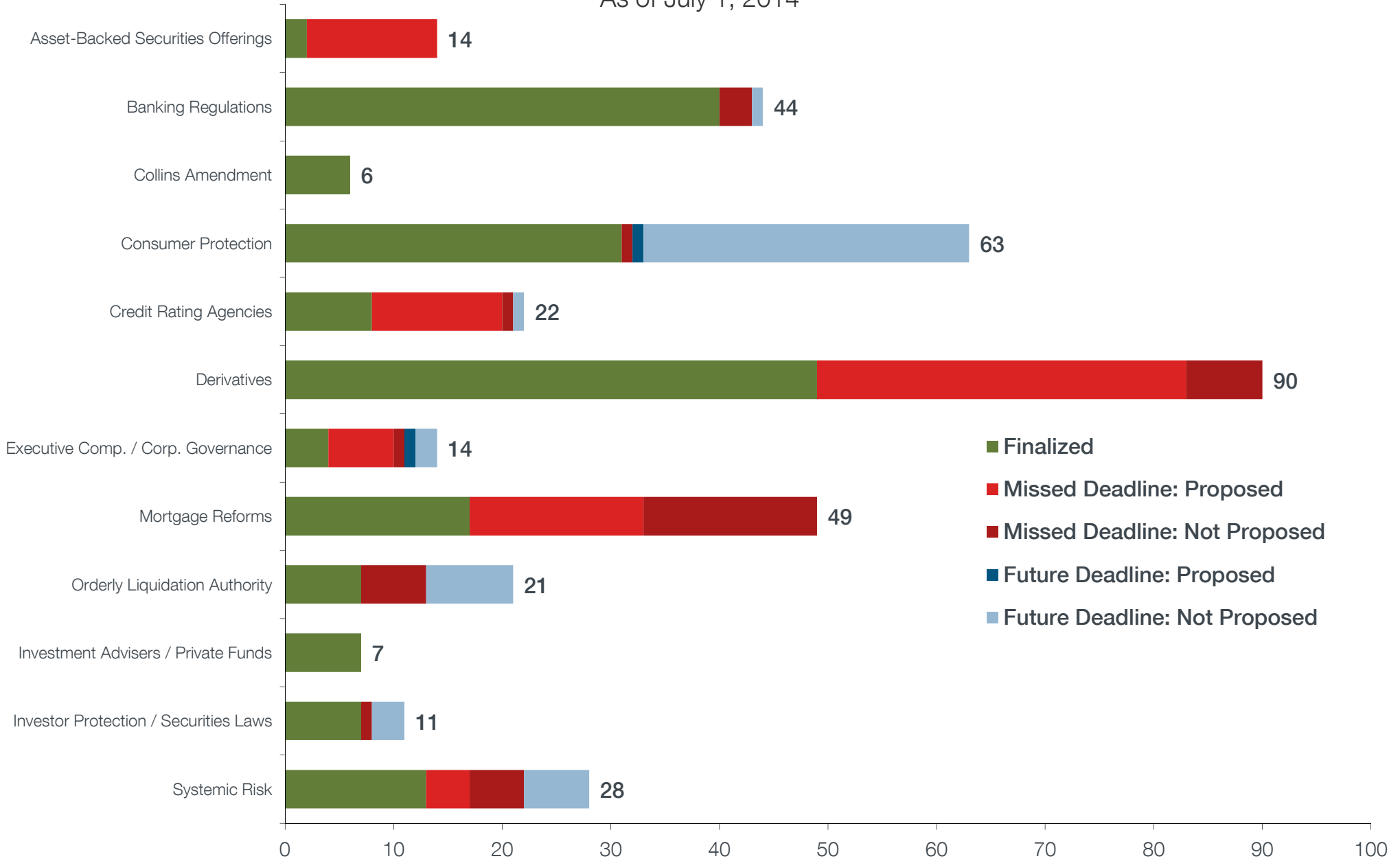


Rulemaking counts are based on estimates and require judgment.

**Values Refer to Number of Rulemaking Requirements**

# Dodd-Frank Rulemaking Progress in Select Categories

As of July 1, 2014



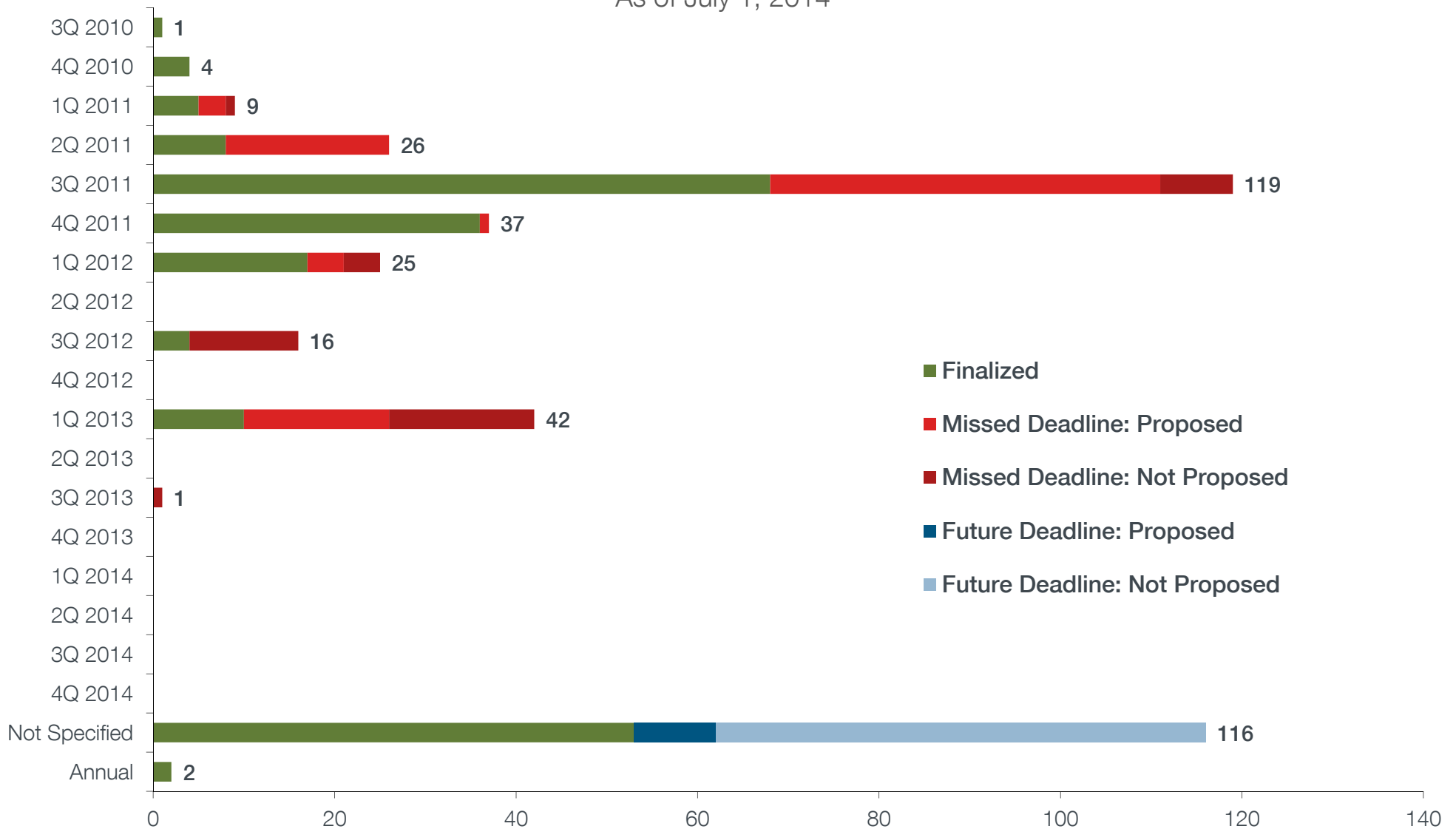
Rulemaking counts are based on estimates and require judgment.

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



# DavisPolk Dodd-Frank Rulemaking Progress by Due Date

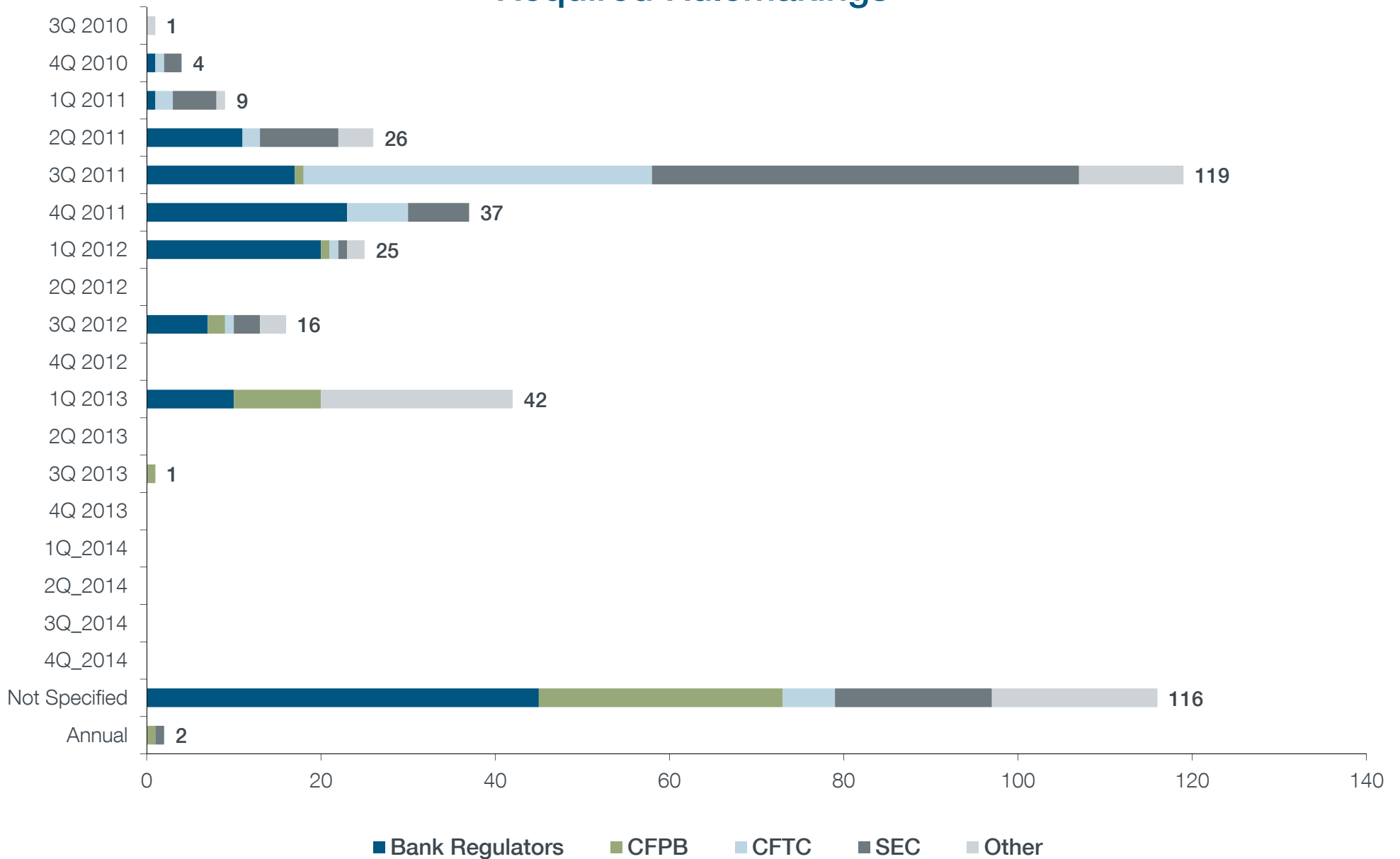
As of July 1, 2014



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

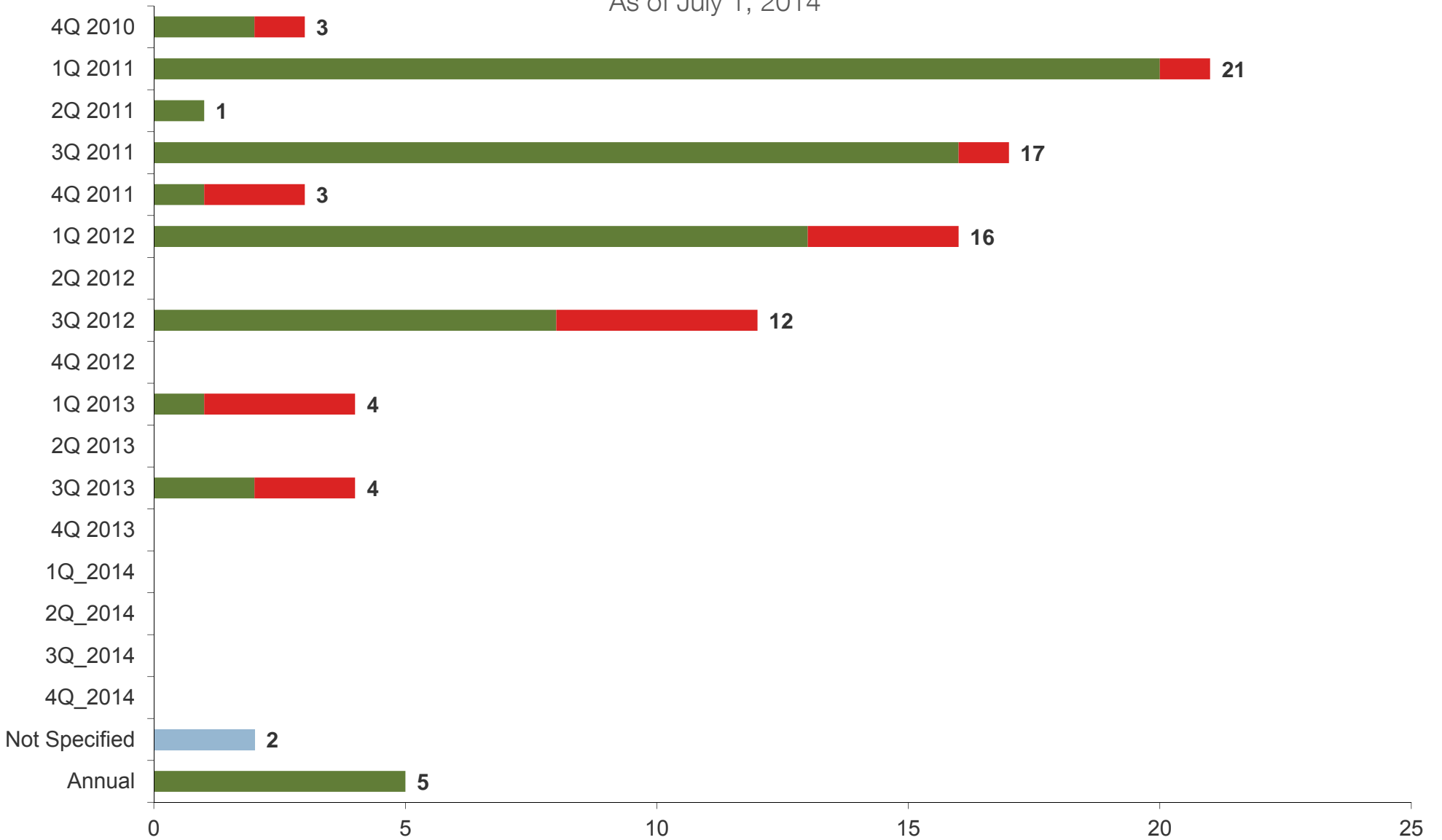


Rulemaking counts are based on estimates and require judgment.

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

# Dodd-Frank Study Progress by Due Date

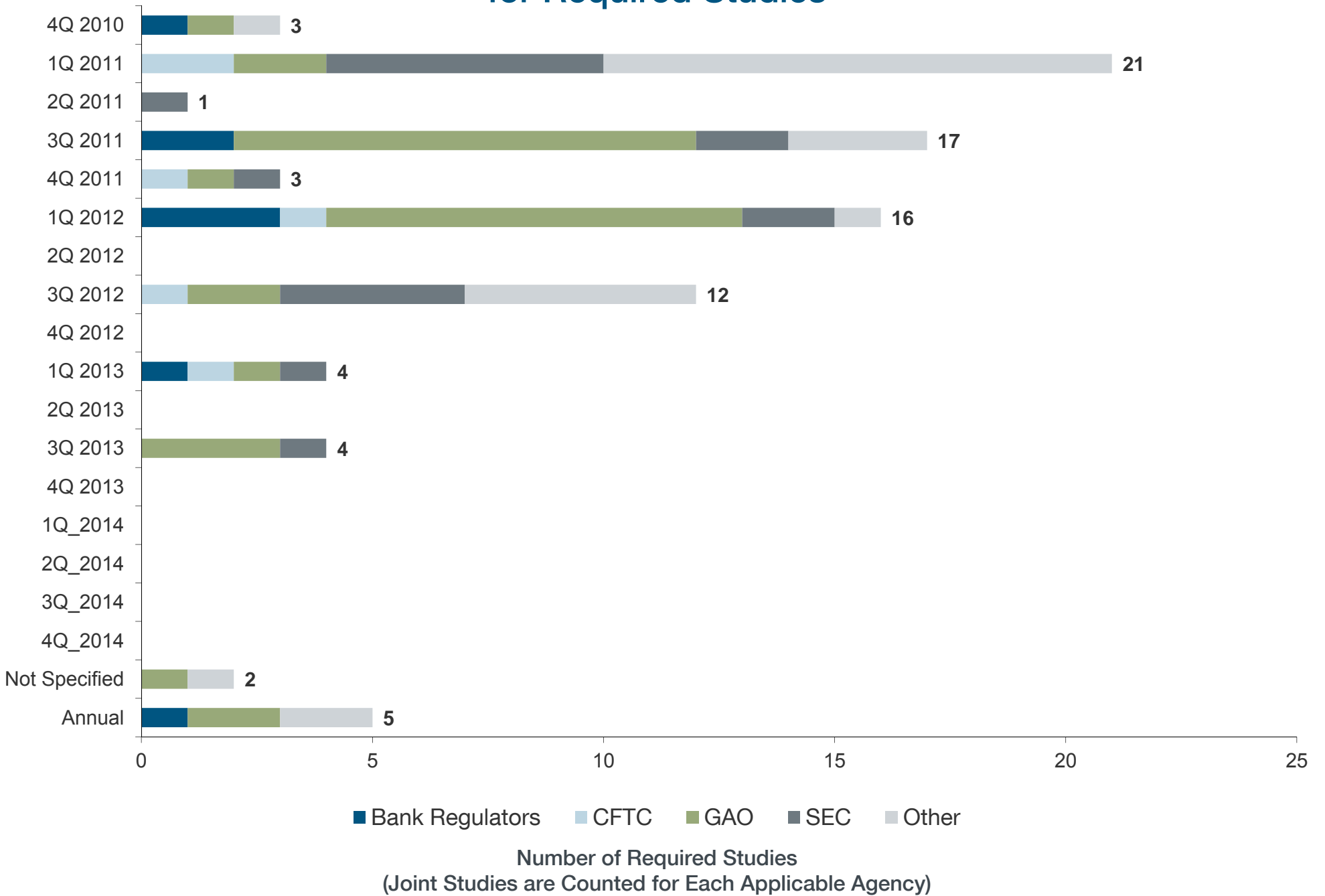
As of July 1, 2014



■ Finalized    ■ Missed Deadline    ■ Future Deadline

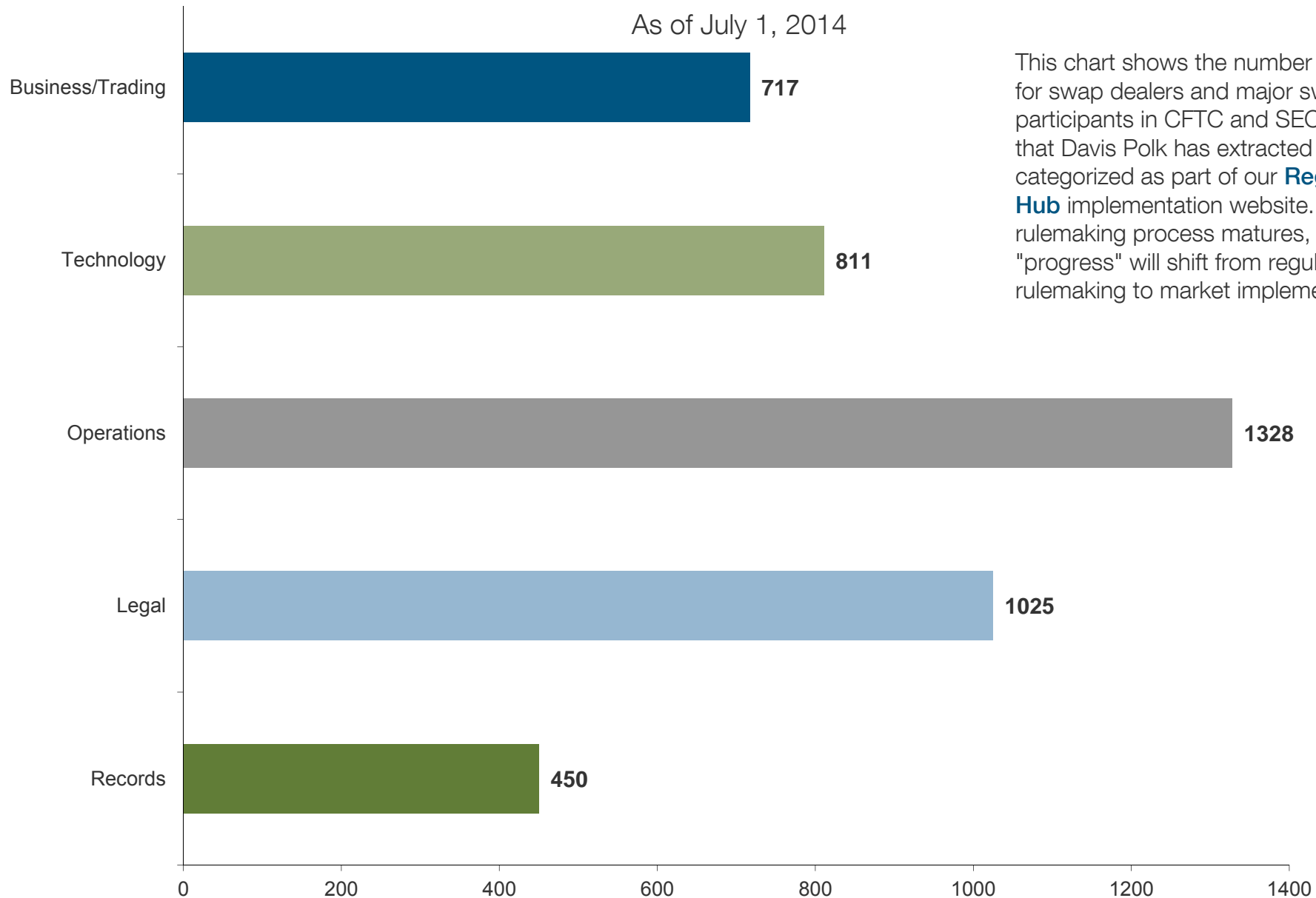
Number of Required Studies  
(Joint Studies are Counted for Each Applicable Agency)

# Dodd-Frank Statutory Deadlines for Required Studies



# Tasks for Swap Dealers and Major Swap Participants

As of July 1, 2014



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.

For more information, please contact [hub@davispolk.com](mailto:hub@davispolk.com).

## 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](mailto: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 Davis Polk Regulatory Tracker™, please contact [tracker@davispolk.com](mailto:tracker@davispolk.com).

## Questions?

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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