Davis Polk

Dodd-Frank Progress Report

Fourth Quarter 2015

In Brief: Fourth Quarter 2015

• 18 Requirements Met. The CFTC adopted a final rule on margin requirements for uncleared swaps, and the FCA, FDIC, Fed, FHFA and OCC adopted a joint final rule on margin, capital and segregation requirements for covered swap entities. The Fed adopted a final rule on emergency lending by Federal Reserve Banks. The CFPB adopted a final rule amending the Home Mortgage Disclosure Act to include several new reporting requirements.

State of Play to Date:

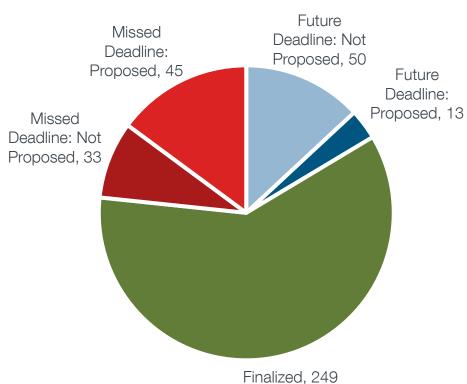
- As of December 31, 2015, 271 rulemaking deadlines have passed. Of the 271 rulemaking requirements with deadlines that have passed, 204 (75.3%) have been met with finalized rules and rules have been proposed that would meet 34 (12.5%) more. Rules have not yet been proposed to meet 33 (12.2%) passed rulemaking requirements.
- Of the 390 total rulemaking requirements, 267 (68.46%) have been met with finalized rules and rules have been proposed that would meet 40 (10.26%) more. Rules have not yet been proposed to meet 83 (21.28%) rulemaking requirements.

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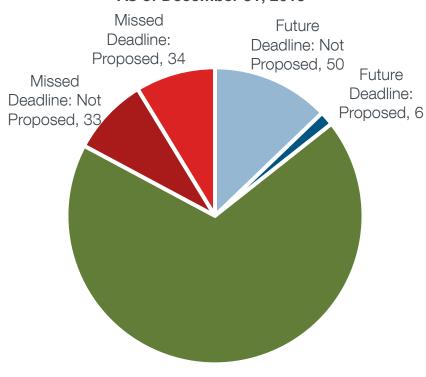
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Davis Polk Dodd-Frank Rulemaking Progress by Quarter

As of September 30, 2015



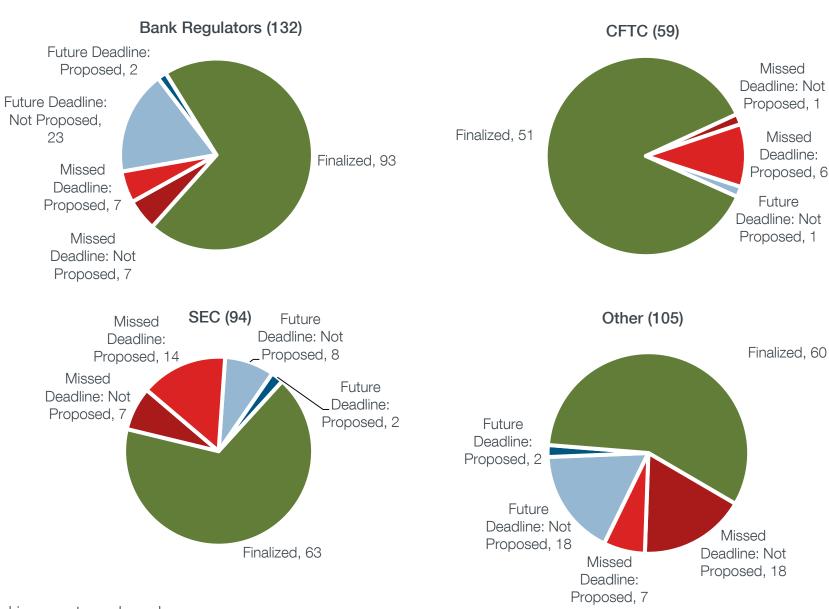
As of December 31, 2015



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Dodd-Frank Rulemaking Progress by Agency

As of December 31, 2015



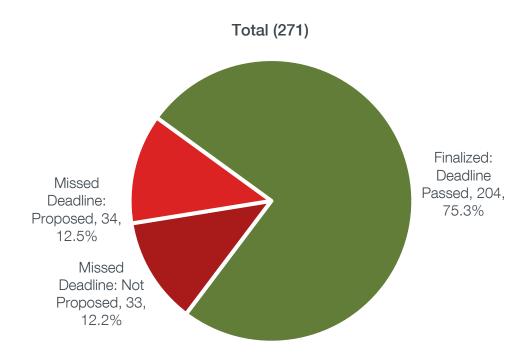
Rulemaking counts are based on estimates and require judgment.

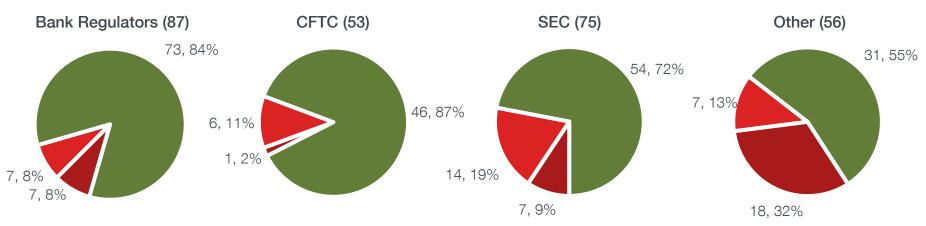
Values Refer to Number of Rulemaking Requirements

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Dodd-Frank Rulemaking Progress on Passed Deadlines

As of December 31, 2015



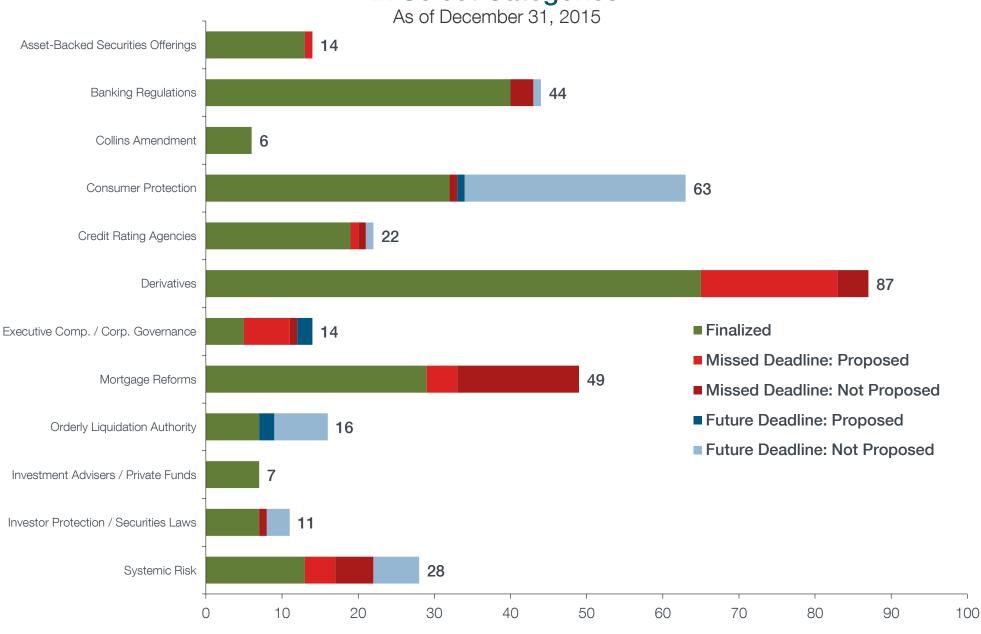


Rulemaking counts are based on estimates and require judgment.

Values Refer to Number of Rulemaking Requirements



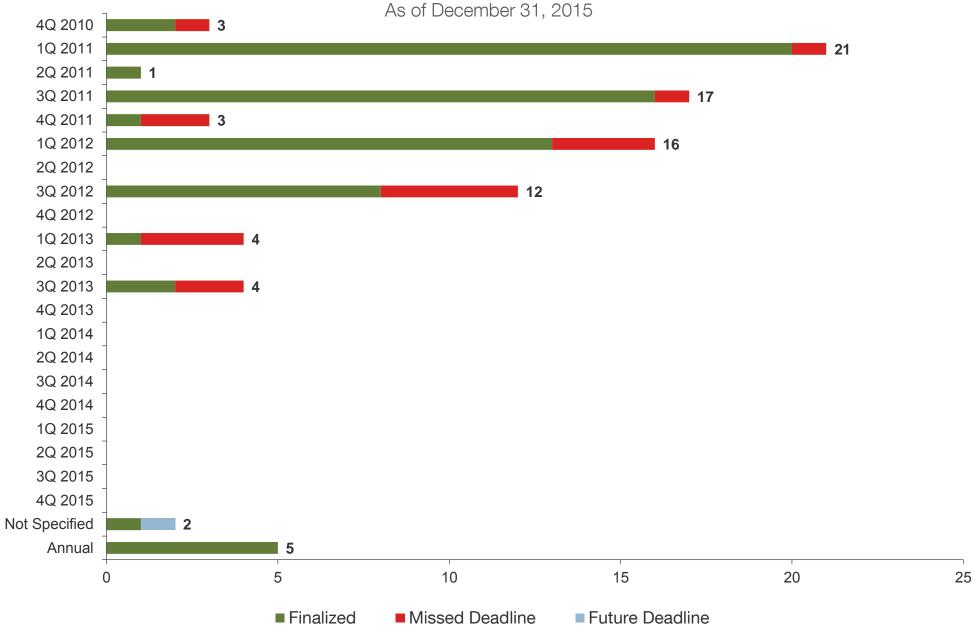
Dodd-Frank Rulemaking Progress in Select Categories



Rulemaking counts are based on estimates and require judgment.

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

Davis Polk Dodd-Frank Study Progress by Due Date



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

About the Progress Report

- 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 TrackerTM 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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Questions?

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