

27 November 2014

Ms. Melissa Jurgens
Secretary
Commodity Futures Trading Commission
Three Lafayette Center
1155 21st St., N.W.
Washington, DC 20581
United States of America

Dear Ms. Jurgens,

Self-certification of Amendments to SGX-DC Clearing Rules

1 Introduction

1.1 Singapore Exchange Derivatives Clearing Limited ("**SGX-DC**"), a derivatives clearing organisation ("**DCO**") registered with the Commodity Futures Trading Commission (the "**Commission**"), hereby submits a self-certification for amendments to its Clearing Rules (the "**Amendments**") pursuant to Commission regulation 40.6(a).

2 Intended Implementation Date

2.1 The Amendments are proposed to be implemented in January 2014, but will not be implemented prior to the Commission's 10 business day review period.

3 Explanation and Analysis

3.1 The Amendments are to facilitate SGX-DC's acceptance for clearing of the following contracts (the "**Contracts**") that are to be launched in January 2014:

(a) SGX MB Iron Ore CFR China (58% FE Fines) Swap; and

(b) SGX TSI Iron Ore CFR China (58% FE Fines) Swap.

Singapore Exchange Derivatives Clearing Limited

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3.2 In particular, the Amendments specify the methodology for the calculation of final settlement prices of the Contracts in the SGX-DC Clearing Rules.

3.3 SGX-DC is registered as an approved clearing house under the Securities and Futures Act of Singapore and regulated by the Monetary Authority of Singapore ("MAS"). The Amendments are subject to the MAS' regulatory concurrence.

4 Description of Amendments

4.1 Appendix 1 of the SGX-DC Clearing Rules would be amended as a result of the Amendments.

4.2 The text of the Amendments with the changes indicated is attached as Appendix 1.

5 Certification of Compliance with Core Principles

5.1 The Amendments have been promulgated in respect of SGX-DC's compliance with Core Principle E on settlement procedures and seek to provide clarity on the final settlement prices for the Contracts.

5.2 SGX-DC hereby certifies to the Commission that the Amendments comply with the Commodity Exchange Act, as amended, and the regulations promulgated thereunder.

6 Public Notice of Pending Certification

6.1 SGX-DC has made publicly available a notice of the Amendments' pending certification with the Commission, together with a copy of this submission on its website at http://www.sgx.com/wps/portal/sgxweb/home/regulation/consult_pub/dco_submissions.

7 Opposing Views

7.1 There were no opposing views expressed to SGX-DC by its board or committee members, SGX-DC Clearing Members or market participants that were not incorporated into the Amendments. If any opposing views are received by SGX-DC during the Commission's review period, such views will be communicated to the Commission accordingly.

8 Contact Details

- 8.1 Please do not hesitate to contact the undersigned at ludovico.cardone@sgx.com or +65 6713 7765 should you require any clarification.

Yours sincerely,



Ludovico Cardone
Assistant Vice President
Legal (Regulation)

Appendix 1

Text of the Amendments

Appendix 1 of the SGX-DC Clearing Rules – Final Settlement Price

Iron Ore Swap Contracts

Product	Iron Ore Swap		
Contract	<u>SGX TSI Iron Ore CFR China (62% Fe Fines) Swap</u>	<u>SGX MB Iron Ore CFR China (58% FE Fines) Swap</u>	<u>SGX TSI Iron Ore CFR China (58% FE Fines) Swap</u>
Final Settlement Price	Cash settlement using the arithmetic average of all The Steel Index (TSI) <u>Iron Ore Fines 62% FE - CFR Tianjin Port iron-ore</u> reference prices in the expiring month, rounded to 2 decimal places.	<u>Cash settlement using the arithmetic average of all the aggregate daily values of MBIOI - 58% FE Fines, CFR Qingdao Index and MBIOI - 58% Premium FE Fines, CFR Qingdao Index reference prices, as published by Metal Bulletin, in the expiring contract month, rounded to 2 decimal places.</u>	<u>Cash settlement using the arithmetic average of all The Steel Index Iron Ore Fines 58% Fe (Low Alumina) - CFR Qingdao Port Index reference prices in the expiring contract month, rounded to 2 decimal places.</u>

Note: Changes are made in blue