**U.S. COMMODITY FUTURES TRADING COMMISSION**
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Division of Clearing and Risk

**To: All Registered Derivatives Clearing Organizations**

**Re: Compliance Date for the Reporting Requirements in Commission Regulation 39.19(c)(1)**

Regulation 39.19(c)(1) sets forth daily reporting requirements for registered derivatives clearing organizations ("DCOs"). The Commission amended this regulation effective September 7, 2023, with a compliance date of February 10, 2025. For the reasons set forth below, the Division of Clearing and Risk ("Division") is issuing this advisory to notify registered DCOs that the Division will not expect compliance with the amended requirements in Regulation 39.19(c)(1) and appendix C to part 39 until June 1, 2026, so long as that DCO continues to comply with the version of Regulation 39.19(c)(1) in effect on September 6, 2023 and Version 1.0.1 of the DCO reporting guidebook issued by the Division ("Reporting Guidebook").[1]

The Commission first adopted Regulation 39.19 in 2011, setting forth certain daily, periodic, and event-based reporting requirements for DCOs. In 2023, the Commission amended the daily reporting requirements in Regulation 39.19(c)(1) and codified existing and new daily reporting fields in new appendix C to part 39 of the Commission's regulations.[2] Although the amendments became effective on September 7, 2023, DCOs were not required to comply with them until February 10, 2025.[3] On January 6, 2025, the Division issued a staff advisory notifying DCOs that the Division would not expect compliance with the amended requirements until December 1, 2025.[4]

Before the daily reporting fields were codified in appendix C, the instructions, reporting fields, and technical specifications for daily reporting were contained in the Reporting Guidebook, which the Division provides to DCOs to facilitate reporting pursuant to Regulation 39.19(c)(1). With the daily reporting fields now codified, the Division revised the Reporting Guidebook to address the format and manner in which DCOs must provide this information to

[1] Commodity Futures Trading Commission Guidebook for Part 39 Daily Reports, Version 1.0.1, Dec. 10, 2021.

[2] Reporting and Information Requirements for Derivatives Clearing Organizations, 88 Fed. Reg. 53664 (Aug. 8, 2023).

[3] *Id*.

[4] CFTC Letter No. 25-01 (Jan. 6, 2025).

the Commission.[5] Ahead of the December 1, 2025 deadline in CFTC Staff Letter No. 25-01, the Division has been working with DCOs to test the reporting fields and ensure that the new version of the Reporting Guidebook contains all of the format and manner specifications necessary to facilitate compliance by DCOs with the daily reporting requirements. The Division understands that certain DCOs require additional time beyond December 1, 2025, to begin reporting in accordance with appendix C and the latest version of the Reporting Guidebook.

Therefore, in order to provide additional time for DCOs to conduct more testing and facilitate compliance with the daily reporting requirements, the Division will not expect compliance with the amended requirements in Regulation 39.19(c)(1) and appendix C to part 39 until June 1, 2026, so long as that DCO continues to comply with the prior version of Regulation 39.19(c)(1) in effect on September 6, 2023, and Version 1.0.1 of the Reporting Guidebook.

Should you have any questions, please do not hesitate to contact Amanda Burks, Special Counsel, at aburks@cftc.gov.

Sincerely,

Richard Haynes
Acting Director

[5] Commodity Futures Trading Commission Guidebook for Part 39 Daily Reports, Version 2.0.2, May 1, 2025.