

April 9, 2026

Richard Haynes, Acting Director
Division of Clearing and Risk
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street NW
Washington, DC 20581

Via Email

Re: Extension of the June 1, 2026 Deadline for DCO Daily Reporting

Dear Richard:

Nodal Clear, LLC (“Nodal Clear”) respectfully requests an extension of the June 1, 2026 compliance date for the amended daily reporting requirements for derivatives clearing organizations (“DCOs”) set forth in Regulation 39.19(c)(1). As described below, Nodal Clear requires additional time, through October 31, 2026, to complete the necessary development and testing schedule to implement the amended daily reporting requirements.

As you are aware, the original compliance date for the amended daily reporting requirements was February 10, 2025. On January 6, 2025, the Division of Clearing and Risk (“DCR”) issued an advisory (CFTC Letter No. 25-01) that extended the compliance date to December 1, 2025, to allow time for the release of an updated Reporting Guidebook. The advisory noted that DCR was “revising the Reporting Guidebook to address the format and manner in which DCOs must provide this information to the Commission.” The advisory concluded by extending the compliance date to December 1, 2025 on the grounds that DCR “needs additional time to conform and release an updated version of the Reporting Guidebook, and [DCR] understands that DCOs therefore will need additional time beyond February 10, 2025, to begin reporting in accordance with appendix C and the latest version of the Reporting Guidebook.” DCR released the final version of the Reporting Guidebook in May 2025. On September 26, 2025, DCR issued another advisory (CFTC Letter No. 25-34) extending the compliance date to June 1, 2026, noting that certain DCOs required additional time to begin reporting in accordance with appendix C and the latest version of the Reporting Guidebook.

Since the release of the final Reporting Guidebook in May 2025, Nodal Clear has been diligently working to address the requirement by the June 1, 2026, deadline. Nodal Clear maintains a rigorous development schedule and allocates resources accordingly. Changes to that development schedule, even though considered months advance, requires diverting resources from ongoing active projects and critical initiatives, which dramatically increases costs to Nodal Clear, seriously impacts crucial business initiatives, and potentially impacts contractual obligations. Additionally, to maintain the integrity of Nodal Clear’s regulatory reporting requirements these new reports will need to be subject to standard testing and quality assurance processes that also must be built into the timeline. Although Nodal Clear is

working diligently to finish development associated with the final Guidebook, it anticipates efforts to meet the June 2026 compliance date will likely be insufficient and place significant challenges upon its business requirements and initiatives. As such, Nodal Clear has determined more time is necessary to ensure implementation of the amended daily reporting requirements to be fully compliant.

For these reasons, Nodal Clear respectfully requests an extension of the compliance date through October 31, 2026, or such later date the CFTC deems appropriate.

Please let us know if you have any questions or need additional information. Thank you for considering our request.

Respectfully submitted,

/s/ Ken McCracken
Ken McCracken
General Counsel

/s/ Cody Alvarez
Cody Alvarez
Chief Compliance Officer &
Corporate Counsel