

SUBMISSION COVER SHEET

IMPORTANT: Check box if Confidential Treatment is requested ☐

Registered Entity Identifier Code (optional): 15-052

Organization: Chicago Mercantile Exchange Inc. ("CME")

Filing as a: ☐ DCM ☒ SEF ☐ DCO ☐ SDR Please note - only ONE choice allowed.

Filing Date (mm/dd/yy): January 28, 2015 Filing Description: Adoption of CME SEF Recordkeeping and Reporting Policy

SPECIFY FILING TYPE

Please note only ONE choice allowed per Submission.

Organization Rules and Rule Amendments

- | | | |
|-------------------------------------|-------------------------------------|------------|
| <input checked="" type="checkbox"/> | Certification | § 40.6(a) |
| <input type="checkbox"/> | Approval | § 40.5(a) |
| <input type="checkbox"/> | Notification | § 40.6(d) |
| <input type="checkbox"/> | Advance Notice of SIDCO Rule Change | § 40.10(a) |
| <input type="checkbox"/> | SIDCO Emergency Rule Change | § 40.10(h) |

Rule Numbers: N/A

New Product

Please note only ONE product per Submission.

- | | | |
|--------------------------|---------------------------------------|------------|
| <input type="checkbox"/> | Certification | § 40.2(a) |
| <input type="checkbox"/> | Certification Security Futures | § 41.23(a) |
| <input type="checkbox"/> | Certification Swap Class | § 40.2(d) |
| <input type="checkbox"/> | Approval | § 40.3(a) |
| <input type="checkbox"/> | Approval Security Futures | § 41.23(b) |
| <input type="checkbox"/> | Novel Derivative Product Notification | § 40.12(a) |
| <input type="checkbox"/> | Swap Submission | § 39.5 |

Official Product Name: _____

Product Terms and Conditions (product related Rules and Rule Amendments)

- | | | |
|--------------------------|---------------------------------------------------------|----------------------|
| <input type="checkbox"/> | Certification | § 40.6(a) |
| <input type="checkbox"/> | Certification Made Available to Trade Determination | § 40.6(a) |
| <input type="checkbox"/> | Certification Security Futures | § 41.24(a) |
| <input type="checkbox"/> | Delisting (No Open Interest) | § 40.6(a) |
| <input type="checkbox"/> | Approval | § 40.5(a) |
| <input type="checkbox"/> | Approval Made Available to Trade Determination | § 40.5(a) |
| <input type="checkbox"/> | Approval Security Futures | § 41.24(c) |
| <input type="checkbox"/> | Approval Amendments to enumerated agricultural products | § 40.4(a), § 40.5(a) |
| <input type="checkbox"/> | "Non-Material Agricultural Rule Change" | § 40.4(b)(5) |
| <input type="checkbox"/> | Notification | § 40.6(d) |

Official Name(s) of Product(s) Affected: _____

Rule Numbers: _____

January 28, 2015

VIA ELECTRONIC PORTAL

Mr. Christopher J. Kirkpatrick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581

**Re: CFTC Regulation 40.6(a) Certification. Adoption of CME SEF Recordkeeping and Reporting Policy.
CME SEF Submission No. 15-052**

Dear Mr. Kirkpatrick:

The Swap Execution Facility Division of Chicago Mercantile Exchange Inc. ("CME SEF"), pursuant to Commodity Futures Trading Commission ("CFTC" or "Commission") Regulation 40.6(a), hereby notifies the Commission that it is self-certifying the adoption of a new CME SEF Recordkeeping and Reporting Policy (the "Policy"), effective on February 12, 2015. The Commission informed CME SEF personnel that each SEF must have in place rules or other publicly available documentation setting forth its compliance with parts 43 (Real-Time Public Reporting) and 45 (Swap Data Recordkeeping and Reporting Requirements). This Policy sets forth aspects of CME SEF's compliance with requirements of parts 43 and 45 not addressed by the CME SEF Rulebook. CME SEF intends to make this Policy available for review by market participants by posting it on the CME SEF web site.

Generally, this Policy sets forth CME SEFs practices for reporting trades executed on CME SEF to CME SDR and CME SEF's recordkeeping practices. More specifically, the Policy addresses:

- Reporting of transactions as soon as practicable after execution pursuant to regulation 43.3(b)(1) and Appendix A to Part 43;
- Advance notice of potential disclosure of swap transaction and pricing data to market participants prior to public dissemination of such data by CME SDR as required by regulation 43.3(b)(3);
- Submission of cancellations of swap transaction data submitted to CME SDR in compliance with regulation 43.3(e)(1)-(2);
- Reporting of data to CME SDR following notice of an inability to receive or queue data in compliance with regulation 43.3(g)(2);
- Timestamps of swap transaction and pricing data in compliance with regulation 43.3(h)(1) and (h)(4);
- Reporting of notional value of swaps pursuant to regulation 43.4(f)(2)(i-ii);
- Recordkeeping of all activities related to the business of the SEF with respect to swaps in compliance with regulation 45.2;
- Reporting of creation data as soon as technologically practicable in compliance with regulation 45.3(a);
- Generating and utilizing USIs in compliance with regulation 45.5;
- Identification of counterparties to swaps by LEI in compliance with regulation 45.6;
- Transmission of USIs to CME's DCO in compliance with regulation 45.10(a)(1);
- Reporting of errors or omissions in swap data reported in compliance with regulation 45.14(a); and
- Reporting of all required data fields to CME SDR in compliance with Part 45, Appendix 1.

CME SEF staff and the CME Legal Department collectively reviewed the swap execution facility core principles ("Core Principles"), as set forth in the CEA, and identified the following Core Principles as potentially being impacted:

- Monitoring of Trading and Trade Processing – The Policy sets forth certain procedures for processing CME SEF trade data and reporting it to CME SDR.
- Timely Publication of Trading Information – The Policy sets forth CME SEF's procedures for reporting data to CME SDR in compliance with parts 43 and 45.
- Reporting and Recordkeeping – The Policy sets forth internal recordkeeping procedures for CME SEF and specifically requires CME SEF to keep all records required by part 37.

Pursuant to Section 5c(c) of the CEA and CFTC Regulation 40.6(a), CME SEF certifies that the proposed Policy complies with the CEA and regulations thereunder. CME SEF is not aware of any substantive opposing views to the proposed amendments.

CME SEF certifies that this submission has been concurrently posted on the CME Group website at <http://www.cmegroup.com/market-regulation/rule-filings.html>.

If you require any additional information regarding this submission, please contact me at 212-299-2200 or via e-mail at Christopher.Bowen@cmegroup.com, or Grey Tanzi at 312-930-2326 or via e-mail at Grey.Tanzi@cmegroup.com.

Sincerely,

/s/ Christopher Bowen
Managing Director and Chief Regulatory Counsel

Attachment: Exhibit A – CME SEF Recordkeeping and Reporting Policy

EXHIBIT A

CME SEF RECORDKEEPING AND REPORTING PROCEDURES

1. Swap Transaction and Pricing Data

All swap transactions entered into on CME SEF are reported to CME SDR as soon as technologically practicable after their execution. Swap transaction and pricing data entered through Globex or ClearPort (for block trades) are transmitted without delay to all downstream systems. It is possible that swap transaction and pricing data could be disclosed on the trading screen prior to public dissemination by CME SDR. In the event that such data is disclosed on the trading screen prior to public dissemination by CME SDR, this disclosure is seen only by CME SEF Market Participants and is visible to all CME SEF Market Participants in a non-discriminatory fashion in compliance with CFTC Regulation 43.3(b)(3).

2. Errors in Reported Data

If CME SEF becomes aware of an error or omission in the swap transaction or pricing data reported to CME SDR or receives notification from a reporting party pursuant to CME SEF Rule 528B that an error or omission in reporting occurred, it promptly submits corrected data to CME SDR in compliance with CFTC Regulation 43.3(e)(1).

As required by Regulation 43.3(e)(2), CME SEF will not submit a cancellation or correction of swap transaction or pricing data to CME SDR for the purpose of gaining or extending a delay in the public dissemination of accurate swap transaction or pricing data or to otherwise evade the reporting requirements of Part 43. CME SEF further will not submit a cancellation or correction of swap transaction or pricing data received from a reporting party pursuant to CME SEF Rule 528B if it believes that the reporting party has submitted the cancellation or correction to CME SEF for the purpose of gaining or extending a delay in the public dissemination of accurate swap transaction or pricing data or to otherwise evade the reporting requirements of Part 43.

3. Technical Problems in SDR

If CME SDR encounters technical problems and is unable to receive or hold in queue swap transaction and pricing data, CME SEF re-reports all data not properly received by the CME SDR as soon as it receives notice that CME SDR has resumed normal operations, in compliance with Regulation 43.3(g)(2).

4. Swap and Counterparty Identification

CME SEF generates and assigns a Unique Swap Identifier ("USI") for each swap executed on or pursuant to the rules of CME SEF at or as soon as technologically practicable following the time of execution of the swap and prior to the reporting of swap creation data to CME SDR in compliance with Regulation 45.5(a)(1). The USI includes, in a single data field: (i) the unique alphanumeric code

assigned to CME SEF by the Commission; and (ii) an unique alphanumeric code automatically generated and assigned to the swap by CME SEF systems. CME SEF electronically transmits the USI to: 1) CME SDR, as part of its report of required swap creation data; 2) each counterparty to the swap, as soon as technologically practicable after the execution of the swap; and 3) CME's DCO, as a part of its report of required swap creation data, all as required by Regulation 45.4(a)(2). The USI for the swap is included in all reporting concerning the swap in compliance with Regulation 45.5(e) for the entire lifecycle of the swap regardless of any lifecycle events or changes in state data including, but not limited to, any changes with respect to the counterparties to or the ownership of the swap. In the case of pre-allocation swaps executed on or pursuant to the rules of CME SEF, the USI is included in the swap creation data reported to the CME SDR and transmitted to the reporting counterparty and the agent in compliance with Regulation 45.5(d)(1)(i).

As required by Regulation 45.6, counterparties to any swap executed on CME SEF are identified by their Legal Entity Identifiers ("LEIs") in all reporting pursuant to Part 45 of the Commission regulations.

5. Recordkeeping

CME SEF keeps all records required by and under the terms of Regulation 45.2. More specifically, CME SEF keeps full, complete, and systematic records, together with all pertinent data and memoranda, of all activities related to the business of the CME SEF with respect to swaps, including all records required by Part 37, all as required by Regulation 45.2(a). All records CME SEF is required by Commission regulation to keep are retrievable and reportable in compliance with Regulation 45.2(d).

CME SEF keeps all records with respect to each swap throughout the life of the swap and for a period of at least 5 years following the termination of the swap as required by Regulation 45.2(c). All records of the swap include its USI for at least as long as those records are required by the CEA or the Commission to be kept. Further, in compliance with Regulation 45.6, counterparties to any swap executed on or pursuant to the rules of CME SEF are identified by their LEIs in all records kept pursuant to Part 45. All records required by Commission regulation are readily accessible via real time electronic access by CME SEF throughout the life of the swap and for two years following the final termination of the swap and are retrievable by CME SEF within 3 business days throughout the remainder of the required retention period as required by Regulation 45.2(e)(1). All records required under the CEA and CFTC Regulations are open to the inspection under the procedures of CME SEF Rule 415 upon request by representatives of the CFTC, Department of Justice, Securities and Exchange Commission, or any representative of a prudential regulator as authorized by the CFTC in compliance with Regulation 45.2(h). CME SEF will also provide electronic or hard copies of required records to any representative at CME SEF's expense when requested by the CFTC.

In compliance with Regulation 43.3(h)(1), CME SEF time stamps swap transaction and pricing data relating to all publicly reportable swap transactions with a date and time to at least the nearest second of when CME SEF (i) receives such data from a swap counterparty (if applicable); and (ii)

transmits such data to a registered SDR for public dissemination. CME SEF maintains records of these time stamps for a period of at least 5 years from the execution of such publicly reportable swap transactions, in compliance with regulation 43.3(h)(4).