DTCC Data Repository

March 20, 2017

By Electronic Submission
Mr. Chris Kirkpatrick
Secretary
Commodity Futures Trading Commission
1155 21st Street, N.W.
Washington, D.C. 20581

DDR Rule Filing: DDR06

Re: Amendments to DTCC Data Repository (U.S.) LLC Rulebook Pursuant to Section 5c(c)
(1) of the Commodity Exchange Act and Commission Regulation § 40.6

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended, and Commodity Futures
Trading Commission (the "Commission" or "CFTC") Regulation § 40.6, DTCC Data Repository
(U.S.) LLC ("DDR") submits, by written certification, amendments to the DTCC Data Repository
(U.S.) LLC Rulebook ("DDR Rulebook"), including, but not limited to, the changes enumerated
below.

   I.   DDR has amended the cover page of the DDR Rulebook to update the effective date.

   II.   DDR has amended DDR Rulebook Section 1.1 to clarify that Users may be required to
         execute additional membership documentation, beyond the User Agreement, to obtain access
         to DDR's SDR Services.

   III. DDR has amended DDR Rulebook Section 1.2 to clarify that Users are subject to all
         Applicable Law including Applicable Regulations relevant to the User or the transaction
         associated with such User.

   IV.   DDR has amended DDR Rulebook Section 1.3 to clarify current practices related to the
         ability of Users to view paper confirmations (if any exist).

V.   DDR has amended DDR Rulebook Section 3.3.1 to reflect the addition of "original swap termination data" as supported continuation data reported via discrete transactions or point-in-time position snapshots.

VI.   DDR has amended DDR Rulebook Section 3.3.3.2 to remove references to specific No-Action Relief Letters and to remove the specific requirements of the exceptions or exemptions to clearing in order to streamline the description of the requirements.

VII.   DDR has amended DDR Rulebook Section 4.2 to clarify that the DDR System will check each USI received to ensure that the USI is well-formed (e.g., use of namespace) and that the identifier has not been previously used between the two counterparties and to clarify that DDR will only assign a USI for Canadian submissions if requested to do so.

VIII.   DDR has amended DDR Rulebook Section 4.3 to remove the reference to GMEI, a specific LEI Issuer and to clarify that each User that is a Reporting Party must provide an LEI.

IX.   DDR has amended DDR Rulebook Section 4.5 to define EID as an Event Identifier and to clarify that DDR will validate that any new event message for a given UTI, in addition to USI, has a new unique EID for that submitter.

X.   DDR has amended DDR Rulebook Section 5.1.2 to clarify and provide guidance on the submission guidelines related to Canadian Public Price Dissemination requirements.

XI.   DDR has amended DDR Rulebook Section 5.1.3 to clarify that the restriction on disclosing the identity of a party to the swap also applies to a security-based swap.

XII.   DDR has amended DDR Rulebook Section 5.3 to clarify that DDR calculates whether a specified swap qualifies as a block trade pursuant to CFTC Part 43 based upon User indication in its message submission, for certain asset classes.

XIII.   DDR has amended DDR Rulebook Section 5.5 to clarify that DDR will make transaction level reports of aggregated transactions available to the public pursuant to the Canadian Regulations.

XIV.   DDR has amended DDR Rulebook Section 6.3 to clarify that DDR will not make commercial use of real-time swap data prior to its public dissemination.

XV.   DDR has amended DDR Rulebook Section 7.1 to provide an explanation of how unscheduled system downtime impacts the dissemination and receipt of information.

XVI.   DDR has amended DDR Rulebook Section 8.2 to include a description of DDR's Wind-Down Plan.

XVII.   DDR has amended DDR Rulebook Section 10.1.1 to remove superfluous language related to how validation checks are performed.

XVIII.   DDR has amended DDR Rulebook Section 10.1.2 to clarify how Users can access trade detail reports in the event of dispute between Users.

XIX.   DDR has amended DDR Rulebook Section 10.2 to add language confirming that DDR will promptly notify all Designated Regulators should an Applicant be denied access to SDR Services, or limited in respect of access to services offered, directly or indirectly.

XX.   DDR has amended DDR Rulebook Section 10.3.1 to clarify that DDR can recommend termination of a User to the Board for failure to pay fees when due.

XXI.   DDR has amended DDR Rulebook Section 11.1 to include a description of the DDR Conflicts of Interest Resolution Process.

XXII.   DDR has amended DDR Rulebook Section 12 to include additional Canadian regulators in the definition of Canadian Regulators, to eliminate specific references to individual Canadian regulators, and to add or update definitions including: Applicable Publications, CFTC Regulations, DDR System, MSBSP, PPD, Reporting Party, SBSD, SEC Regulations and Transaction Record.

XXIII.   DDR has amended DDR Rulebook Appendix A to remove the Repository User Agreement for Qualified Multilateral Trading Facilities.

XXIV.   DDR has amended DDR Rulebook Appendix B to include additional Canadian regulators in the Canadian Repository Appendix to the Operating Procedures.

XXV.   DDR has amended DDR Rulebook Appendix C to include Canada specific references in the Privacy Policy.

In addition to the changes described above, additional minor edits have been made throughout the DDR Rulebook. Any material modifications to the DDR Rulebook, including the DDR Operating Procedures, outlined in this letter have been approved by the DDR Board pursuant to DDR Operating Procedures Important Legal Information Section 3 Notices.

DDR certifies that these amendments comply with the Commodity Exchange Act and the rules and regulations promulgated by the Commission thereunder. No substantive opposing views have been

expressed by Users or others with respect to the amendments. DDR further certifies that, concurrent with this filing today, a copy of this submission was posted on its website and may be accessed at: http://www.dtcc.com/legal/important-notices?subsidiary=DerivSERV&category=DTCC+Data+Repository+US+LLC&pgs=1.

As noted above, enclosed with this letter is a marked version of the DDR Rulebook and DDR Operating Procedures. If you have any questions or need further information, please contact me at 813 470-1447.

Sincerely,

Kyle Romig
Director and Assistant General Counsel

Enclosures