

21 March 2017

Mr. Chris Kirkpatrick Secretary Commodity Futures Trading Commission Three Lafayette Center 1155 21st St., N.W. Washington, DC 20581 United States of America

Dear Mr. Kirkpatrick

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 ("Commission"), hereby submits a self-certification for amendments ("Amendments") to its Clearing Rules ("SGX-DC Clearing Rules") pursuant to Commission regulation 40.6(a).

2. Intended Implementation Date

2.1 The Amendments are proposed to be implemented in 1 January 2018.

3. Explanation and Analysis

- 3.1 SGX-DC currently clears the SGX TSI Iron Ore CFR China (62% Fe Fines) Swap contract. The final settlement price ("FSP") of this contract is calculated as the arithmetic average of all the daily values of The Steel Index ("TSI") Iron Ore Fines 62% FE CFR Tianjin Port.
- On 18 January 2017, TSI announced that it would be proceeding with proposed changes to update the specification and delivery point of the TSI Iron Ore 62% Fe Benchmark Index. TSI's proposed changes will take effect on 1 January 2018.
- As SGX-DC's contract references the index published by TSI, amendments are necessary to update the relevant FSP provisions within the SGX-DC Clearing Rules.

4. Description of Amendments

4.1 Appendix 1 of the SGX-DC Clearing Rules sets out the FSP of the various swap contracts cleared by SGX-DC.

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- 4.2 With TSI's proposed change, the SGX-DC Clearing Rules has been updated to remove references to the Tianjin Port in the FSP provision for the affected contract.
- 4.3 The text of the Amendments with the changes indicated is attached in 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 affected contract.
- 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 the following address:

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 <u>benjamin.kong@sgx.com</u> or +65 6236 8593 should you require any clarification.

Yours sincerely

Benjamin Kong

Assistant Vice President

Regulatory Development and Policy

Regulation

Appendix 1

Amendments to the SGX-DC Clearing Rules

Proposed amendments are marked in blue.

<u>Appendix 1 – Final Settlement Price</u>

Iron Ore Swap Contracts

Products	Iron Ore Swap		100	
Contract	SGX TSI Iron Ore CFR China (62% Fe Fines) Swap	SGX MB Iron Ore CFR China (58% FE Fines) Swap	SGX TSI Iron Ore CFR China (58% FE Fines) Swap	SGX Platts Iron Ore CFR China (Lump Premium) Swap
Final Settlement Price	Fron Ore Fines 62% FE — CFR Tianjin PortCFR China reference prices in the expiring month, rounded to 2 decimal places.	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.	of all The Steel Index Iron Ore Fines 58% Fe (Low Alumina) — CFR Qingdao Port Index reference	Cash settlement using the arithmetic average of all Platts IO Spot Lump Premium 62.5% CFR China Index reference prices in the expiring contract month, rounded to 4 decimal places