

DTCC Data Repository

55 WATER STREET

NEW YORK, NY 10041-0099

August 24, 2018

By Electronic Submission

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

DDR Rule Filing: DDR14

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 (a) in addition to (i) execution of membership documents such as the User Agreement and (ii) compliance with the technical specifications, DDR requires (iii) compliance with Applicable Law as part of the Participation Criteria for Users to participate in its services, and (b) Users have an obligation to notify DDR in the event a User at any point fails to comply with any or all of the Participation Criteria.
- III. DDR has amended DDR Rulebook Section 1.2 to clarify that (i) Users are required to maintain at least two (2) Super Access Coordinators; (ii) the contact information for all User representatives must be kept up-to-date; and (iii) important information may be communicated to User representatives, who then have the responsibility to share this information with any relevant parties within the User’s organization.
- IV. DDR has amended DDR Rulebook Section 1.3 to clarify that by entering into a User Agreement each User is bound by the terms of the DDR Rules.

- V. DDR has amended DDR Rulebook Section 1.5 to remove fee provision not required by regulation.
- VI. DDR has amended DDR Rulebook Section 6.2 to remove duplicative language related to regulator access that is specifically addressed in Rulebook Section 6.5.
- VII. DDR has amended DDR Rulebook Section 6.5 to conform to updated CFTC regulations regarding data access.
- VIII. DDR has deleted DDR Rulebook Section 6.5.1 as the subject matter has been consolidated into revised Rulebook Section 6.5.
- IX. DDR has amended DDR Rulebook Section 12 to remove superfluous or duplicative defined terms.
- X. DDR has amended the DDR Operating Procedures to require User notifications be sent to a specific DDR notices email address.

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 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>.

Enclosed with this letter is a marked version of the DDR Rulebook. 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