

11 October 2017

Mr. Christopher J. 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 (the "**Commission**"), hereby submits a self-certification for amendments to its Clearing Rules (the "**Amendments**") pursuant to Commission regulation 40.6(a).

2 Intended Implementation Date

2.1 The Amendments are proposed to be implemented on 1 January 2018, but will not be implemented prior to the Commission's 10 business day review period.

3 Explanation and Analysis

3.1 The Amendments are in respect of SGX-DC's extension of the clearing fee structure for the OTC Financial ("**OTCF**") Interest Rate Swaps ("**IRS**") for Clearing Members' House trades for 2018, which are due to expire on 31 December 2017.

Singapore Exchange Derivatives Clearing Limited

Company Reg No. 200005878M
(A wholly-owned subsidiary of Singapore Exchange Limited)

2 Shenton Way, #02-02 SGX Centre 1, Singapore 068804
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4 Description of Amendments

4.1 The table below summarizes the clearing fee structure for the OTCF IRS:

| | Current Fee Structure | | Year 2018 | |
|-------------------------------------|---|---|---|---|
| | Interest Rate Swaps (IRS) | Non-Deliverable IRS (NDIRS) | Interest Rate Swaps (IRS) | Non-Deliverable IRS (NDIRS) |
| Clearing Fee | Tenor, Fee Rate < 2y, 0.26bp 2to<5y, 0.30bp 5to<10y, 0.36bp 10to30y, 0.42bp | Tenor, Fee Rate < 2y, 0.26bp 2to<5y, 0.30bp 5to<10y, 0.36bp 10y, 0.42bp | Partial reinstatement of clearing fee: Tenor, Fee Rate < 2y, 0.09bp 2to<5y, 0.15bp 5to<10y, 0.26bp 10to30y, 0.40bp | Partial reinstatement of clearing fee: Tenor, Fee Rate < 2y, 0.09bp 2to<5y, 0.15bp 5to<10y, 0.26bp 10y, 0.40bp |
| Monthly Clearing Fee Rebate* | Monthly fee (S\$), Rebate >30K-50K, 20% >50K-100K, 40% >100K, 50% | Monthly fee (US\$), Rebate >30K-50K, 20% >50K-100K, 40% >100K, 50% | No change. | No change. |
| Annual Fee Cap | S\$ 600,000 | US\$ 400,000 | No change. | No change. |
| Backloading Fee | S\$ 50,000 | US\$ 50,000 | No change. | No change. |

5 Certification of Compliance with Core Principles

5.1 The Amendments have been promulgated in respect of SGX-DC's compliance with Core Principle B on financial resources.

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.

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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](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 william.ng@sgx.com or +65 6236 8762 should you require any clarification.

Yours sincerely,



William Ng
Assistant Vice President
Compliance

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