

**Eurex Clearing AG**  
**ECAG Rule Certification--DCO Compliance Manual Amendments**  
**October 28, 2022**

1. The text of the proposed amendments to the Eurex Clearing AG (“Eurex Clearing”) DCO Compliance Manual (the “Manual”) is appended as Attachment A. Any additions are underlined and any deletions are struck through.
2. The date of intended implementation of the proposed amendments is ten business days following the filing of this submission.
3. Attached please find a certification that: (1) these rules comply with the Commodity Exchange Act (the “Act”), and the Commission’s regulations thereunder; and (2) concurrent with the filing of this submission, Eurex Clearing is posting a copy of this filing with redactions for confidential information to its website at: <https://www.eurex.com/ec-en/rules-regs/regulations/cftc-dco-filings>.
4. A concise explanation and analysis of the operation, purpose, and effect of the amended rule appears below.
5. There were no opposing views expressed regarding these amended rules.
- 6. Confidential treatment pursuant to CFTC Regulation 40.8(c) is requested for Attachment A, which is the Manual and the revisions thereto. Please see attached letter for detailed written justification.**

---

CONCISE EXPLANATION AND ANALYSIS OF THE OPERATION, PURPOSE, AND EFFECT OF THE PROPOSED RULE AND ITS COMPLIANCE WITH APPLICABLE PROVISIONS OF THE ACT, INCLUDING CORE PRINCIPLES AND THE COMMISSION’S REGULATIONS THEREUNDER

Eurex Clearing is proposing the following amendments to the Manual:

1. Further clarification of the US CCO’s meetings with the Executive Board
2. Further clarification of the CFTC Rule 39.11(f) quarterly reporting process
3. Edits to reflect the CFTC’s 2020 revisions to CFTC Rule 39.11
4. Edits to reflect the CFTC Order Granting Exemption From Certain Provisions of the Commodity Exchange Act Regarding Investment of Customer Funds and From Certain Related Commission Regulations, 83 Fed. Reg. 35,241 (July 25, 2018)
5. Further clarification of the reporting processes for CFTC Rule 39.18(g) & (h)
6. Further clarification of the reporting processes for CFTC Rule 39.19(c)(4)
7. Additional reference to the account opening procedure for Clearstream Banking Frankfurt in compliance with Part 22
8. Additional reference to the 40.6 filing procedure
9. Other non-substantive amendments

Eurex Clearing identifies that the proposed amendments to the Manual are related to corresponding DCO Core Principle and accompanying regulations set forth in the DCO Compliance Manual.

CERTIFICATIONS PURSUANT TO SECTION 5c OF THE COMMODITY EXCHANGE ACT, 7  
U.S.C. §7a-2 AND COMMODITY FUTURES TRADING COMMISSION RULE 40.6, 17 C.F.R. §40.6

I hereby certify that:

- (1) the amended Rule complies with the Commodity Exchange Act, and the Commission's regulations thereunder; and
- (2) concurrent with the filing of this submission, Eurex Clearing is posting a copy of this filing with redactions for confidential information to its website at:  
<https://www.eurex.com/ec-en/rules-regs/regulations/cftc-dco-filings>.

/s/ Eric Seinsheimer

By: Eric Seinsheimer

Title: US CCO, Eurex Clearing AG

Dated: October 28, 2022