

1 November 2018

Mr. Christopher J. Kirkpatrick
Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Dear Mr. Kirkpatrick,

RE: 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 2019, but will not be implemented prior to the Commission's ten (10) business day review period.

3 Explanation and Analysis

3.1 The Amendments are in respect of SGX-DC's revision of clearing fees for the following coal products:

- (a) SGX TSI CFR China Premium JM25 Coking Coal Swap ("**CC**");
- (b) SGX TSI FOB Australia Premium Coking Coal Swap ("**AC**"); and
- (c) SGX Option on TSI FOB Australia Premium Coking Coal Swap ("**CAC**" /" **PAC**").

3.2 As the market for coking coal has matured, the clearing fees for the above products are being revised from its introductory pricing to align the cost of clearing these products with related products in the steel value chain such as Iron Ore and dry bulk Forward Freight Agreements.

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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sgx.com

4 Description of Amendments

4.1 The revised clearing fees for the products are as follows:

| Clearing Fee Type | Description | Existing clearing fees | Revised clearing fees |
|-------------------|---|------------------------|-----------------------|
| | | CC, AC, CAC, PAC | CC, AC, CAC, PAC |
| Cf 1 | Trading Member (Individual) | US\$ 2.50 | US\$ 6.00 |
| Cf 2 | Clearing Member House Account | US\$ 2.50 | US\$ 6.00 |
| Cf 3 | Trading Member (Broker) House Account | US\$ 2.50 | US\$ 6.00 |
| Cf 5 | Clearing Member Customer Account | US\$ 3.50 | US\$ 6.00 |
| Cf 6 | Trading Member (Broker) Customer Account | US\$ 3.50 | US\$ 6.00 |
| Cf 7 | Trading Member (Proprietary) (Customer) | US\$ 2.50 | US\$ 6.00 |
| Cf 8 | Clearing Member Related Company House Account | US\$ 2.50 | US\$ 6.00 |
| Cf E | Trading Member's Trading Representatives (House) | US\$ 2.50 | US\$ 6.00 |
| Cf F | Trading Member's Trading Representatives (Customer) | US\$ 2.50 | US\$ 6.00 |
| Cf G | Clearing Member's Trading Representatives (House) | US\$ 2.50 | US\$ 6.00 |
| Cf K | Trading Member (Proprietary) (House) | US\$ 2.50 | US\$ 6.00 |

* Fees shown are before Goods and Services Tax.

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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 thereafter.

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 dennis.t@sgx.com or +65 6713 6738 should you require any clarification.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Dennis Tan", written in a cursive style.

Dennis Tan
Assistant Vice President
Compliance