

# DTCC Data Repository

November 6, 2020

**By Electronic Submission**

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

DDR Rule Filing: DDR27

**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 3.3.1 to reflect the updated message types that will be supported by DDR for the ingestion of data following the rearchitecture of the DDR System.
- III. DDR has amended DDR Rulebook Section 3.3.2 to remove “trusted source” references and descriptions, as this concept is no longer supported within the DDR System.
- IV. DDR has amended DDR Rulebook Section 3.3.3 to: (i) remove the description of applicable data formats as this information has been superseded by the information contained in revised Section 3.3.1; (ii) direct Users to the DDR website as the location for most up-to-date information on how Users who qualify for an exemption, exception or other relief from the clearing requirement can elect to claim such exemption, exception or other relief; (iii) remove restatements of regulatory requirements associated with exemptions, exceptions, or other relief from mandatory clearing requirements; and (iv) to remove the verification process descriptions as these are no longer supported within the DDR System (record reconciliation and correction process set forth new Section 3.3.4).

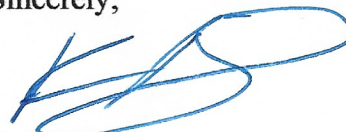
- V. DDR has amended the DDR Rulebook to include a new Section 3.3.4 to describe the four types of reports that are made available to Users to allow them to review and reconcile data and to describe how Users can correct any errors discovered during such reconciliation.
- VI. DDR has amended DDR Rulebook Section 4.2 to reflect that creation and assignment of a USI or UTI will occur prior to submission of a message to DDR.
- VII. DDR has amended DDR Rulebook Section 4.3 to reflect that a legal entity utility is in place to process Legal Entity Identifiers (LEI) (DDR requires a User to provide its LEI when onboarding).
- VIII. DDR has amended DDR Rulebook Section 10.1 to remove references to inapplicable concepts (e.g. dispute messages and trusted sources) and to reflect an updated data correction process whereby trade detail reports are provided to all Users, Users are responsible for resolving any disputes between themselves uncovered during the reconciliation process, and, in the event an error is identified, the submitting User is responsible for submitting a correction to the record.
- IX. DDR has amended DDR Rulebook Section 12 to reflect the inclusion of the defined term "Transaction Record", which means "information regarding a new trade submitted to DDR or update to a trade previously submitted."

In addition to the changes described above, additional minor edits have been made throughout the DDR Rulebook. Any material modifications to the DDR Rulebook 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: <https://www.dtcc.com/legal/sec-rule-filings?subsidiary=DerivSERV&pgs=1>.

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