

Exhibit A

Explanation of Amendments to Rulebook

Capitalized terms used but not defined herein have the meanings assigned to them in the Rulebook.

Amendment	Explanation
<u>Table of Contents</u>	
Conformed page references	Clarification
<u>Rule 101</u>	
1. Added definitions of “EMTA” and “Relevant EMTA Template”	1. Clarification
2. Added definition of “Independent Director” as used in Rule 204(b)	2. CFTC Staff Request
3. Added definition of “Non-Deliverable Component Pair” as used in Rule 1102	3. CFTC Regulation § 37.4
4. Added definitions of “Reportable Swap Data” and “Swap Transaction and Pricing Data”	4. CFTC Part 43
5. Updated cross-references to Rule 524 in the definitions of “Maker”, “Recipient”, “Request for Quote” and “RFQ”, “Sender” and “Taker” to conform to renumbering of Rule 524	5. Clarification
6. Replaced the definition of “review period” with new definitions of “Reverse RFQ Review Period” and “Standard RFQ Review Period” each as used in Rule 524	6. Clarification
7. Amended the definition of “Block Trade” to conform to the definition in CFTC Regulation 43.2	7. CFTC Regulation 43.2
8. Amended the definition of “Swap Data Repository” to include reference to Part 49 of the CFTC Regulations and to clarify that such entity receives Reportable Swap Data (rather than only Required Swap Creation Data)	8. CFTC Regulation 45.1
9. Revised definition of “Trading Privileges” to include the right of DMA Customers to transmit Orders and originate and/or respond to Requests for Quote through the Trading System	9. CEA § 1a(34)

Amendment	Explanation
<p><u>Rule 204(b)</u></p> <p>Amended to provide that the Regulatory Oversight Committee will consist of two (2) members, one of whom will serve as chair and will meet the certain requirements for independence, and that in the event of a tie vote between the Regulatory Oversight Committee members with respect to any matter requiring a vote, the independent director will cast the deciding vote</p>	<p>CFTC Staff Request</p>
<p><u>Rule 207</u></p> <ol style="list-style-type: none"> 1. Amended to separately address the recordkeeping requirements under CFTC Regulation 45.2(c) and other recordkeeping requirements under the CEA and CFTC Regulations 2. Amended to add that the Company will keep records relating to swaps defined in section 1a(47)(A)(v) of the CEA open to inspection and examination by the Securities and Exchange Commission 3. Amended to incorporate the full list of regulators that the Company is obligated to allow inspect records and to provide that copies of records provided to the CFTC upon the CFTC's request shall be provided at the expense of the Company 	<ol style="list-style-type: none"> 1. CFTC Regulations 43.3(h) and 45.2(c) 2. CFTC Regulation 37.1000 3. CFTC Regulation 45.2(h)
<p><u>Rule 401(a)(8)</u></p> <ol style="list-style-type: none"> 1. Amended to delete the requirement that Participants and/or Authorized Traders keep, or cause to be kept, records pertaining to trading of their Customers per clarification from CFTC Staff that the requirements of CFTC Regulation 37.404(b) must apply to all market participants 2. Clarified that such information shall be required to be provided only upon request 3. Added that such information shall be made available to the CFTC upon request 	<p>CFTC Regulation 37.404(b)</p>

Amendment	Explanation
<p><u>Rule 406</u></p> <ol style="list-style-type: none"> 1. Amended to add new subsection (b) and renumbered accordingly. 2. Amended to add in new subsection (b) providing that, per clarification from CFTC Staff that the requirements of CFTC Regulation 37.404(b) must apply to all market participants, Customers shall keep and make available to the Company, the Regulatory Services Provider and/or the CFTC, or shall arrange for the Participant or Authorized Trader engaging in activity on the Trading System on behalf of the Customer to keep and make available, as agent for the Customer, books and records required to be kept and produced pursuant to CFTC Regulation 37.404 and, solely with respect to DMA Customers, CFTC Regulations 1.31 and 1.35 	<ol style="list-style-type: none"> 1. Clarification 2. CFTC Regulations 1.31, 1.35 and 37.404(b)
<p><u>Rule 520</u></p> <p>Amended to include description of establishment and monitoring of position limits for Contracts that are subject to a position limitation established by the CFTC pursuant to section 4a(a) of the CEA</p>	<p>CFTC Regulation 37.600(b)</p>
<p><u>Rule 523</u></p> <p>Amended to provide that the Company will adopt position limitations or position accountability levels “as necessary and appropriate” rather than “as is deemed necessary or appropriate by the Company”</p>	<p>CFTC Regulation 37.600</p>
<p><u>Rule 524(a)</u></p> <p>Amended to remove the Request for Quote functionality from the description of execution methods for Required Transactions</p>	<p>CFTC Regulation 37.9(a)(3)</p>
<p><u>Rule 524(b)</u></p> <p>Amended to add description of the Request for Quote functionality available as execution methods for Permitted Transactions</p>	<p>CFTC Regulation 37.9(c)</p>
<p><u>Rule 525(b)</u></p> <p>Amended to add a reference to the expiration date of CFTC No-Action Letter 15-25</p>	<p>CFTC Staff Request</p>

Amendment	Explanation
<p><u>Rule 526</u></p> <p>Amended the heading of Rule 526 and 526(a)</p>	<p>Clarification</p>
<p><u>Rule 526(i)</u></p> <p>Amended to add a new paragraph (i) stating that the Company shall report to the Swap Data Repository any cancellation and/or new trade entered into pursuant to Rule 526</p>	<p>Parts 43 and 45 of the CFTC Regulations</p>
<p><u>Rule 527(g)</u></p> <p>Amended to add clarification that the limitations on liability in Rule 527 do not change the Company’s obligation under the CEA or CFTC Regulations</p>	<p>CFTC Staff Request</p>
<p><u>Rule 528(a)</u></p> <ol style="list-style-type: none"> 1. Amended to clarify that the Company will report all Reportable Swap Data to a Swap Data Repository as soon as technologically practicable following execution and that such Reportable Swap Data shall include the actual notional or principal amount for a Swap 2. Amended to clarify that the Company may provide Swap Transaction and Pricing Data (rather than Required Swap Creation Data) to Participants and Authorized Traders no earlier than it transmits such information to a Swap Data Repository 	<ol style="list-style-type: none"> 1. CFTC Regulations 43.3(b)(1), 43.4(f)(2)(i), 45.1, 45.3(a) 2. CFTC Regulation 43.3(b)(3)
<p><u>Rule 528(c)</u></p> <p>Amended to identify DTCC Data Repository (US) LLC as the Swap Data Repository to which the Company will report all Reportable Swap Data</p>	<p>CFTC Staff Request</p>
<p><u>Rule 528(d)</u></p> <p>Amended to replace references to “Required Swap Creation Data” with references to “Reportable Swap Data”</p>	<p>CFTC Regulations 43.3(b)(1), 45.1, 45.3(a)</p>

Amendment	Explanation
<p><u>Rule 528(e)</u></p> <ol style="list-style-type: none"> 1. Amended to add that, for any pre-allocation Swap, the Company will transmit the unique swap identifier for such Contract to the Reporting Counterparty and to the agent 2. Amended to replace reference to “reporting counterparty” with a reference to the defined term “Reporting Counterparty” 	<ol style="list-style-type: none"> 1. CFTC Regulation 45.5(d)(1)(i) 2. Clarification
<p><u>Rule 528(f)</u></p> <p>Amended to add to Rule 528 a new subsection (f) which incorporates the requirements of CFTC Regulation 45.3(f) relating to multi-asset swaps</p>	<p>CFTC Regulation 45.3(f)</p>
<p><u>Rule 529</u></p> <ol style="list-style-type: none"> 1. Amended to replace reference to “Required Swap Creation Data” with reference to “Reportable Swap Data” 2. Amended to add that the Company will report any errors or omissions in data that it previously reported to a Swap Data Repository as soon as technologically practicable after the discovery thereof 	<ol style="list-style-type: none"> 1. CFTC Regulations 43.3(e)(1)(ii) and 45.14(a) 2. CFTC Regulations 43.3(e)(1)(iii) and 45.14(a)
<p><u>Rule 601(a)</u></p> <p>Amended to clarify that Block Trades will only be permitted to the extent consistent with any advisory notice or other rule (as defined in CFTC Regulation 40.1) implemented by the Company</p>	<p>CFTC Regulation 43.1</p>
<p><u>Rule 601(b)(1)</u></p> <ol style="list-style-type: none"> 1. Amended to replace references to replace references to “applicable minimum block size” and “minimum block size” with “appropriate minimum block size” 2. Amended to include currency conversion requirements for foreign-currency denominated block trades 3. Amended to include details of when aggregation is permissible to satisfy the minimum block trade size requirements 4. Amended to add that parties to a block trade must be Eligible Contract Participants 	<ol style="list-style-type: none"> 1. CFTC Regulation 43.2 2. CFTC Regulation 43.6(h)(4) 3. CFTC Regulation 43.6(h)(6)(i) 4. CFTC Regulation 43.6(i)(1)

Amendment	Explanation
<p><u>Rule 601(b)(2)</u></p> <p>Amended to replace reference to “the minimum quantity for each respective maturity” with a reference to “appropriate minimum block size for such Swap”</p>	<p>CFTC Regulation 43.2</p>
<p><u>Rules 601(b)(5) and 601(b)(6)</u></p> <ol style="list-style-type: none"> 1. Renumbered existing Rule 601(b)(5) as Rule 601(b)(6) and amended such Rule by replacing reference to “required Block Trade Data” with a reference to “Reportable Swap Data (including notification of Block Trade election)” 2. Amended to add new Rule 601(b)(5) that provides that parties to a transaction intended to be treated as a Block Trade must (a) notify the Company of their election to treat the transaction a Block Trade, (b) notify the Company of the actual notional or principal amount of the Block Trade and (c) report such notional or principal amount and all other required information with respect to such Block Trade as soon as technologically practicable, but no later than ten (10) minutes following execution 	<ol style="list-style-type: none"> 1. CFTC Regulations 43.3(b)(1), 43.6(g)(1)(ii), 45.1, 45.3(a) 2. CFTC Regulations 43.6(g)(1)(i), 43.6, 43.4(f)(2)(ii)
<p><u>Rule 710(b)</u></p> <p>Amended to state that each Disciplinary Panel will include sufficient different membership interests so as to ensure fairness and prevent special treatment or preference for any Person in the conduct of the Disciplinary Panel’s responsibilities</p>	<p>CFTC Regulation 1.64(c)(4)</p>
<p><u>Rule 710(e)</u></p> <p>Amended to clarify that information, records, materials and documents provided to a Disciplinary Panel may be disclosed to respond to a CFTC request</p>	<p>Core Principle 5</p>
<p><u>Rule 1002</u></p> <p>Amended the definition of “Cleared Contract” to clarify that it includes Contracts that are intended to be cleared but which are not accepted for clearing by a Derivatives Clearing Organization</p>	<p>Clarification</p>

Amendment	Explanation
<p><u>Rule 1101</u></p> <ol style="list-style-type: none"> 1. Amended to correct typographical errors 2. Amended to add clarification that the template terms of the Relevant EMTA Template shall apply to the Contract, which clarification was included in terms and conditions previously submitted to the CFTC by the Company in new product certification (SwapEx Submission 02-13) filed September 30, 2013 and as amended by rule amendment (SwapEx Submission 07-14) filed September 8, 2014 	<ol style="list-style-type: none"> 1. Clarification 2. CFTC Regulation 37.4
<p><u>Rule 1102</u></p> <ol style="list-style-type: none"> 1. Amended to correct typographical errors 2. Amended to include description of how the cash settlement price will be derived and clarification that the template terms of the Relevant EMTA Template shall apply to the Non-Deliverable Component Pair of the Contract, which description and clarification were included in the terms and conditions previously submitted to the CFTC by the Company in new product certification (SwapEx Submission 08-14) filed September 10, 2014 3. Amended to include disclosure regarding the Company's relationship with the WM Company 	<ol style="list-style-type: none"> 1. Clarification 2. CFTC Regulation 37.4 3. Clarification
<p><u>Rule 1103</u></p> <ol style="list-style-type: none"> 1. Amended to correct typographical errors 2. Amended to include disclosure regarding the Company's relationship with the WM Company, which disclosure was included in the terms and conditions previously submitted to the CFTC by the Company in new product certification (SwapEx Submission 10-14) filed December 19, 2014 	<ol style="list-style-type: none"> 1. Clarification 2. Clarification
<p><u>Rule 1104</u></p> <p>Amended to correct typographical errors</p>	<p>Clarification</p>