

DTCC Data Repository

55 WATER STREET

NEW YORK, NY 10041-0099

June 29, 2018

By Electronic Submission

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

DDR Rule Filing: DDR13

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 DDR’s documentation in support of Section 2(h)(7)(A) of the CEA and CFTC Regulations 50.50 and 50.51, as well applicable CFTC Letters, which provide for a number of exceptions and exemptions from required clearing for swaps entered into by certain non-financial end users, financial cooperatives, treasury affiliates, bank holding companies and savings and loan holding companies, and community development financial institutions (collectively, the “End-User Exception”). Changes to DDR’s End-User Exception documents (collectively, the “End-User Exception Documents”), include, but are not limited to, the high level changes enumerated below.

- I. DDR has updated the End-User Exception Documents to reflect all current end-user clearing exceptions and exemptions and applicable CFTC letters.
- II. DDR has amended certain defined terms to align with the regulations.
- III. DDR has amended the documentation to clarify what elections and representation must be made on a swap-by-swap basis and how those elections and representations are made on either an FpML or CSV message.

In addition to the changes described above, additional edits have been made throughout the End-User Exception Documents for clarity and to correct typographical errors.

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 by Users or others 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: <http://www.dtcc.com/legal/important-notices>.

As noted above, enclosed with this letter are marked versions of each of the End-User Documents. If you have any questions or need further information, please contact me at 212-855-3038.

Sincerely,



Adrienne During
Director, DDR Compliance

Enclosures