

**VIA CFTC PORTAL**

10 August, 2016

Mr. Christopher Fitzpatrick  
Commodity Futures Trading Commission  
1155 21st Street NW  
Three Lafayette Centre  
Washington DC 20581

**LCH.Cleernet Limited Self-Certification: Member Circular on Changes to the SwapClear Margining Times and Backload Registration Cycles Times**

Dear Mr Kirkpatrick,

Pursuant to CFTC regulation §40.6(a), LCH.Cleernet Ltd (“LCH”), a derivatives clearing organization registered with the Commodity Futures Trading Commission (“CFTC”), is submitting for self-certification a Circular to SwapClear Clearing Members describing the changes to the SwapClear margining times and Backload Registration Cycles times.

**Part I: Explanation and Analysis**

SwapClear currently processes three intraday margin runs (also referred to as Market Data Refresh or “MDR”) and subsequently calls for collateral from relevant SwapClear Clearing Members. SwapClear is revising the times it will process such MDRs. In addition, on certain days SwapClear carries out Backload Registration Cycles for the registration of Backloaded Trades which have been presented for clearing; following each cycle, SwapClear will calculate the increase in collateral required to register the trades and will notify each relevant SwapClear Clearing Member. The time to process the Backload Registration Cycles will also be revised.

The Member Circular on the above changes is attached hereto as **Appendix I**. The circular will be sent to the SwapClear Clearing Members not before August 24<sup>th</sup>, 2016.

**Part II: Description of Rule Changes**

This submission does not require any changes to the LCH Rulebook.

**Part III: Core Principle Compliance**

LCH has concluded that compliance with the Core Principles will not be adversely affected by this change.

**Part IV: Public Information**

LCH has posted a notice of pending certification with the CFTC and a copy of the submission on LCH’s website at:

<http://www.lch.com/rules-regulations/proposed-rules-changes>

**Part V: Opposing Views**

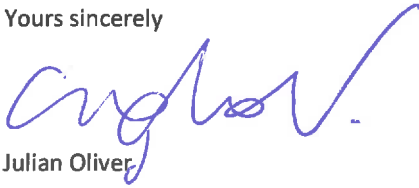
There were no opposing views expressed to LCH by governing board or committee members, members of LCH or market participants that were not incorporated into this submission.

**Certification**

LCH hereby certifies to the CFTC, pursuant to the procedures set forth in Commission Regulation § 40.6, that attached rule submission complies with the Commodity Exchange Act, as amended, and the regulations promulgated there under.

Should you have any questions please contact me at [julian.oliver@lch.com](mailto:julian.oliver@lch.com).

Yours sincerely



P.P.

Julian Oliver  
Chief Compliance Officer  
LCH.Clearnet Limited

Appendix I

LCH.Clearnet Limited - SwapClear Circular

Circular No. LCH Circular No **xxx**

Service Circular No. SwapClear Circular No **xx**

Date: **xx** August 2016

To: All SwapClear Clearing Members

**Subject: Changes to the SwapClear Margining Times and Backload Registration Cycles Times**

On each Business Day and in accordance with SwapClear Procedure 1.9.4 the Clearing House is entitled to call for Collateral intra-day. With effect from 12<sup>th</sup> September 2016 the Clearing House will be changing the times at which it assesses the value of all SwapClear Contracts (referred to as Market Data Refresh or 'MDR') and subsequently calls for Collateral. The table below shows the current times and the revised times.

Day	Current	Revised
1 <sup>st</sup> MDR	08:20 London Time	09:00 London time
2 <sup>nd</sup> MDR	14:15 London Time	14:15 London time (No change)
3 <sup>rd</sup> MDR	14:05 EST	17:00 London time

With effect from 12<sup>th</sup> September 2016 the Clearing House will be changing the times at which it runs Backload Registration Cycles. The table below shows the current times and the revised times.

Day	Current	Revised
Monday – Wednesday	17:00 London Time	12:00 London time
Thursday	17:00 London Time	19:30 London time
Friday	No Cycle	No Cycle.

If you have any questions please contact: SwapClear Client Services at [swapclear.clientservices@lch.com](mailto:swapclear.clientservices@lch.com)

*All times are approximate. The Clearing House's rights to require Collateral are governed by the Rulebook. Nothing contained in this circular shall limit the Clearing House's rights to require Collateral at times other than as described herein. Clearing Members will be notified of any changes in these timings via Clearing Member Circular or Service Notifications. Terms used herein and not defined herein shall have the meaning assigned in the Clearing House Rulebook.*