

### **VIA CFTC PORTAL SUBMISSION**

5 February 2016

Mr. Christopher Kirkpatrick Commodity Futures Trading Commission 1155 21<sup>st</sup> Street NW Three Lafayette Centre Washington DC 20581

Dear Mr. Kirkpatrick:

LCH.Clearnet Limited ("LCH"), a derivatives clearing organization registered with the Commodity Futures Trading Commission (the "CFTC"), is submitting for self-certification, pursuant to CFTC regulation §40.6(a), a new Schedule of Securities Acceptable for Margin Cover Purposes (the "Schedule"). This change takes effect on 22 February 2016.

#### Part I: Explanation and Analysis

LCH proposes to implement this new Schedule following a review of haircuts applied to margin collateral. The list of acceptable securities remains unchanged.

The Schedule is attached hereto along with a confidential submission.

The Schedule will be notified via a circular to Clearing Members prior to the implementation date.

#### Part II: Description of Rule Changes

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

#### Part III: Core Principle Compliance

LCH.Clearnet has concluded that compliance with the Core Principles will not be adversely impacted by this change, and in particular complies with Core Principles D and L.

#### Part IV: Public Information

LCH.Clearnet has posted a notice of pending certification with the CFTC and a copy of this submission on the LCH.Clearnet website at <a href="http://www.lchclearnet.com/rules-regulations/proposed-rules-changes">http://www.lchclearnet.com/rules-regulations/proposed-rules-changes</a>

#### Part V: Opposing Views

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



#### Certification

LCH.Clearnet hereby certifies to the Commodity Futures Trading Commission, 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 regarding this submission please contact me at <a href="mailto:julian.oliver@lchclearnet.com">julian.oliver@lchclearnet.com</a>

Yours sincerely,

Julian Oliver, Chief Compliance Officer

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# **LCH.Clearnet Rule Submission**

# Appendix I

Schedule of Securities Acceptable for Margin Cover

	LTD - Margin Collateral Haircut Schedule		Haircuts on	n 22/09/2014
G	overnment Securities (Description & Bloomberg Code)	Term	Haircut (Conventional Bonds)	Haircut (Inflation Linked Bonds)
		11 business days <= 1yr	4.63%	4.63%
	A to live Town Bill (ACTD)	> 1yr <= 3yrs	5.00%	5.00%
Australia	Australian Treasury Bill (ACTB) Australian Government Bond (ACGB)	> 3yrs <=7 yrs	6.25%	6.25%
Australia	Australian Government I/L (ACGB)	> 7yrs <= 11yrs	6.75%	6.75%
	, ,	> 11yrs <= 30yrs	8.25%	9.25%
		> 30yrs	8.25%	9.25%
		4 business days <= 1yr	4.25%	
		> 1yr <= 3yrs	5.00%	
Austria	Austrian Treasury Bill (RATB) Austrian Government Bond (RAGB)	> 3yrs <=7 yrs	6.75%	
	Austrian Government Bond (RAGB)	> 7yrs <= 11yrs	7.00% 10.50%	
		> 11yrs <= 30yrs > 30yrs	13.50%	
		4 business days <= 1yr	5.00%	
		> 1yr <= 3yrs	6.75%	
	Belgian Treasury Bill (BGTB)	> 3yrs <=7 yrs	9.50%	
Belgium	Belgian Government Bond (BGB)	> 7yrs <= 11yrs	11.25%	
		> 11yrs <= 30yrs	14.25%	
		> 30yrs	16.00%	
		10 calendar days <= 1yr	4.25%	4.25%
	O For Torres Bill (OTD)	> 1yr <= 3yrs	4.88%	4.88%
Canada	Canadian Treasury Bill (CTB) Canadian Government Bond (CAN)	> 3yrs <=7 yrs	5.63%	5.63%
Gariada	Canada Government Real Return Bond (CAN)	> 7yrs <= 11yrs	6.25%	7.25%
		> 11yrs <= 30yrs	8.00%	10.50%
		> 30yrs	8.50%	10.50%
		6 business days <= 1yr	4.38%	
	Danish Treasury Bill (DGTB)	> 1yr <= 3yrs	5.00%	
Denmark	Danish Government Bond (DGB)	> 3yrs <=7 yrs	6.00%	
	Danish Government I/L (DGBI)	> 7yrs <= 11yrs > 11yrs <= 30yrs	6.63% 8.75%	
		> 11yrs <= 30yrs > 30yrs	8.75%	
		4 business days <= 1yr	4.25%	
		> 1yr <= 3yrs	5.00%	
	Finnish Treasury Bill (RFTB)	> 3yrs <=7 yrs	6.00%	
Finland	Finnish Government Bonds (RFGB)	> 7yrs <= 11yrs	6.25%	
		> 11yrs <= 30yrs	7.75%	
		> 30yrs	7.75%	
		4 business days <= 1yr	4.50%	4.50%
	Bons du Trésor à Taux Fixe et Intérêt Précompté (BTF) Bons du Trésor à Taux Fixe et Intérêt Annuel (BTNS)	> 1yr <= 3yrs	5.00%	5.50%
France	Bons du Trésor à Taux Fixe et Intérêt Annuel (BTNS) Bons du Trésor à Taux Fixe et Intérêt Annuel I/L (BTNS)	> 3yrs <=7 yrs	6.00%	8.00%
	Obligations Assimilables du Trésor (FRTR)	> 7yrs <= 11yrs	6.50%	9.50%
	Obligations Assimilables du Trésor I/L (FRTR)	> 11yrs <= 30yrs	10.00%	12.75%
		> 30yrs	14.00%	14.00%
	German Treasury Bill (BUBILL)	3 business days <= 1yr	4.25%	4.25%
	Bundesschatzanweisungen (BKO)	> 1yr <= 3yrs	4.88% 6.00%	4.88% 6.00%
Germany	Bundesobligationen (OBL) Bundesobligationen I/L (OBLI)	> 3yrs <=7 yrs > 7yrs <= 11yrs	6.00%	6.75%
	Deutsche Bundesrepublik (DBR)	> 11yrs <= 11yrs > 11yrs <= 30yrs	10.38%	10.38%
	Deutschland I/L (DBRI)	> 30yrs	11.25%	11.25%
		3 business days <= 1yr	7.25%	7.25%
	Buoni Ordinari del Tesoro (BOTS)	> 1yr <= 3yrs	10.00%	10.00%
lt al	Buoni del Tesoro Poliennali (BTPS)	> 3yrs <=7 yrs	15.00%	15.00%
Italy	Buoni del Tesoro Poliennali I/L (BTPS)	> 7yrs <= 11yrs	16.75%	18.75%
	Certificati di Credito del Tesoro (CCTS)	> 11yrs <= 30yrs	18.75%	21.00%
		> 30yrs	18.75%	21.00%
		6 business days <= 1yr	6.00%	
	Japanese Treasury Bill (JGTB)	> 1yr <= 3yrs	6.25%	
l	Judganiose Fredsury Din (OGTD)	> 3vre <-7 vre	8 00%	1

> 1yr <= 3yrs > 3yrs <= 7 yrs > 7yrs <= 11yrs > 11yrs <= 30yrs

> 30yrs

8.00% 8.50%

12.75% 12.75%

Japanese Treasury Bill (JGTB)
Japanese Treasury Discount Bill (JTDB)
Japanese Government Bond (JGB)

Japan

Gove	rnment Securities (Description & Bloomberg Code)	Term	Haircut (Conventional Bonds)	Haircut (Inflation Linked Bonds)
		5 business days <= 1yr	4.50%	
		> 1yr <= 3yrs	5.25%	
Luxembourg	Luxembougois Government Bonds (LGB)	> 3yrs <=7 yrs	6.00%	
Luxembourg	Euxembougois Government Bonds (EGB)	> 7yrs <= 11yrs	6.88%	
		> 11yrs <= 30yrs	10.25%	
		> 30yrs	10.25%	
		10 business days <= 1yr	4.25%	
		> 1yr <= 3yrs	4.88%	
Netherlands	Dutch Treasury Certificate (DTB)	> 3yrs <=7 yrs	6.00%	
Netricilanus	Dutch Government Bond (NETHER)	> 7yrs <= 11yrs	6.25%	
		> 11yrs <= 30yrs	10.75%	
		> 30yrs	11.75%	
		9 business days <= 1yr	4.25%	
		> 1yr <= 3yrs	5.25%	
Norway	Norwegian Treasury Bill (NGTB)	> 3yrs <=7 yrs	6.25%	
NOIWay	Norwegian Government Bond (NGB)	> 7yrs <= 11yrs	7.75%	
		> 11yrs <= 30yrs	8.00%	
		> 30yrs	8.00%	
		3 business days <= 1yr	6.75%	
		> 1yr <= 3yrs	9.75%	
O	Spanish Letras del Tesoro (SGLT)	> 3yrs <=7 yrs	15.00%	
Spain	Spanish Government Bond (SPGB)	> 7yrs <= 11yrs	17.50%	
		> 11yrs <= 30yrs	22.00%	
		> 30yrs	22.00%	
		4 business days <= 1yr	4.13%	4.13%
		> 1yr <= 3yrs	5.00%	5.75%
O I	Swedish Treasury Bill (SWTB)	> 3yrs <=7 yrs	6.50%	6.50%
Sweden	Swedish Government Bond (SGB) Swedish Government I/L (SGBI)	> 7yrs <= 11yrs	6.88%	6.88%
	Swedish Government I/L (SGBI)	> 11yrs <= 30yrs	8.13%	8.50%
		> 30yrs	8.13%	8.50%
		9 business days <= 1yr	4.25%	4.25%
		> 1yr <= 3yrs	5.00%	5.00%
11.26. 1125	United Kingdom Treasury Bill (UKTB)	> 3yrs <=7 yrs	6.25%	7.50%
United Kingdom	United Kingdom Gilt (UKT) United Kingdom Index Linked Gilt (UKTI)	> 7yrs <= 11yrs	7.00%	9.25%
		> 11yrs <= 30yrs	9.50%	12.50%
		> 30yrs	11.50%	12.50%
		3 business days <= 1yr	4.25%	4.25%
		> 1yr <= 3yrs	5.38%	5.38%
	United States Treasury Bill (B)	> 3yrs <=7 yrs	6.75%	7.50%
United States	United States Treasury Bond (T)	> 7yrs <= 11yrs	7.50%	9.25%
	United States Treasury Inflation Indexed Bond (TII)	> 11yrs <= 30yrs	10.75%	14.25%
		> 30yrs	10.75%	14.25%

	Mortgage Backed Securities (Description & Bloomberg Code)	Term Since Issue	Haircut
		New (0 - 30 months)	16.00%
US MBS	General National Mortgage Association (GNMA)	Medium (30- 60 months)	18.50%
		Seasoned (> 60 months)	N/a

	Government Agencies (Description & Bloomberg Code)	Term	Haircut
		3 business days <= 1yr	4.75%
	Federal National Mortgage Association (FNMA)	> 1yr <= 3yrs	5.50%
US Agencies	Federal Home Loan Mortgage Corporation (FHLMC)	> 3yrs <=7 yrs	8.00%
	Federal Home Loan Banks (FHLB)	> 7yrs <= 11yrs	9.00%
		> 11yrs <= 30yrs	12.25%
		3 business days <= 1yr	4.63%
	Kanada ta Kiin Mindana ta Kanada (KENA)	> 1yr <= 3yrs	5.25%
EUR Agencies	Kreditanstalt für Wiederaufbau (KFW) FMS Wertmanagement (FMSWER)	> 3yrs <=7 yrs > 7yrs <= 11yrs	6.25%
	T WS Wertmanagement (T WSWEIT)		6.63%
		> 11yrs <= 30yrs	10.63%

	Securities issued under Government Credit Guarantee Schemes	Term	Haircut
		3 business days <= 1yr	5.25%
Australia	Government Guaranteed Bonds	> 1yr <= 3yrs > 3yrs <=7 yrs	7.00%
		3 business days <= 1yr	5.00%
Austria	Government Guaranteed Bonds	> 1yr <= 3yrs > 3yrs <=7 yrs	7.25%
		3 business days <= 1yr	5.00%
France	Government Guaranteed Bonds	> 1yr <= 3yrs > 3yrs <=7 yrs	8.00%
		3 business days <= 1yr	4.75%
Germany	Government Guaranteed Bonds	> 1yr <= 3yrs > 3yrs <=7 yrs	6.75%
		3 business days <= 1yr	4.75%
Netherlands	Government Guaranteed Bonds	> 1yr <= 3yrs > 3yrs <=7 yrs	6.75%
		3 business days <= 1yr	4.75%
Sweden	Government Guaranteed Bonds	> 1yr <= 3yrs > 3yrs <=7 yrs	8.50%

Other Stipulations			
Haircuts	To capture the potential FX exposure related to cover being provided in a currency other than the underlying liability, a 4 incremental FX haircut has been applied upon all securities in the schedule above, regardless of the currency of the ass		
	Additional	Certain collateral can at times be subject to additional haircuts above those stated. Members lodging this collateral will be contacted directly as appropriate, and further detail can be obtained by contacting CaLM Risk.	
Market of Issue		Government securities must be issued in the home country of the issuer and be denominated in the domestic currency to be acceptable.  Government agencies and securities issued under Government Credit Guarantee Schemes must both be issued in the home country of the issuer and be denominated in the domestic currency to be acceptable. These instrument categories are maintained using ISIN lists.	
Excluded I	nstruments	Zero coupon bonds, stripped bonds and perpetual bonds Japanese Govt FRNs and Japanese Govt ILBs	
Concentration Controls		In addition to the concentration limits in place upon particular asset types as noted above, LCH.Clearnet reserves the right to manage specific concentrations in margin collateral in all circumstances. Where positions are considered to be excessively concentrated, members will be contacted directly with a view to re-alignment of their portfolio.	

Note: For current haircuts please go to: https://secure-area.lchclearnet.com/secure_area/Default.asp	
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# **LCH.Clearnet Rule Submission**

# Appendix II

### **Request for Confidential Treatment**

# **LCH.Clearnet Rule Submission**

# Appendix III

### **Request for Confidential Treatment**