## Eurex Clearing AG ECAG Rule Certification 069-20 August 11, 2020

- 1. The text of the proposed amendments to the Price List ("**Price List**") of Eurex Clearing AG ("**Eurex Clearing**") is appended as Attachment A. Any additions are underlined and any deletions are struck through.
- 2. For Amendment No. 1 below, the date of intended implementation is October 1, 2020. For Amendments Nos. 2-4 below, the date of intended implementation is September 1, 2020.
- 3. Attached please find a certification that: (1) these amendments comply with the Commodity Exchange Act (the "Act"), and the Commission's regulations thereunder; and (2) concurrent with the filing of this submission, Eurex Clearing is posting a copy of this filing to its website at: <a href="http://www.eurexclearing.com/clearing-en/resources/cftc-dco-filing">http://www.eurexclearing.com/clearing-en/resources/cftc-dco-filing</a>.
- 4. A concise explanation and analysis of the operation, purpose, and effect of the amended rule appears below.
- 5. There were no opposing views expressed regarding these amended rules.
- 6. Confidential treatment is not requested.

CONCISE EXPLANATION AND ANALYSIS OF THE OPERATION, PURPOSE, AND EFFECT OF THE PROPOSED RULE AND ITS COMPLIANCE WITH APPLICABLE PROVISIONS OF THE ACT, INCLUDING CORE PRINCIPLES AND THE COMMISSION'S REGULATIONS THEREUNDER

Eurex Clearing is proposing the following amendments to the Price List:

- 1. Effective October 1, 2020, the proposed amendments add the product ZCIS to the OTC IRD High Turnover Pricing Model. The ZCIS pricing, as part of the High Turnover Pricing Model, will be available to all Disclosed Clients and consist of the constituents detailed in Eurex Clearing Circular 069-20, which is appended as Attachment A.
- 2. The proposed amendments provide that the OTC IRD Maintenance Fee and associated rebates will no longer by calculated daily, but only at the end of the last day of a calendar month. Regarding the calculation and determination of volume-based rebates on the OTC IRD Maintenance Fee, effective September 1, 2020, only the notional outstanding at the end of the last day of a calendar month will be taken into consideration for the determination of applicable rebates.
- 3. The proposed amendments provide that, effective September 1, 2020, Eurex Clearing will introduce a transfer fee for OTC IRD bunched order transactions that are allocated from a Bunch Order Suspense Account to another transaction account via trade transfer / account transfer. The new transfer fee will amount to 100 percent of the applicable Booking Fee and be charged to the

transferee Clearing Member. The Booking Fee for the initial novation of bunched order transactions in designated Bunch Order Suspense Accounts remains free of charge.

4. Eurex Clearing is proposing other clarifying amendments to the Price List.

Further information regarding the operation, purpose, and effect of the proposed amendments is discussed in Attachment A.

Eurex Clearing has identified the following derivatives clearing organization ("DCO") Core Principle as potentially being relevant to the above amendments:

1. <u>DCO Core Principle C (Participant and Product Eligibility)</u>: The proposed amendments will comply with DCO Core Principle C because the amendments amend Price List for certain OTC transactions, and the Price List will continue to be objective, publicly disclosed, and permit fair and open access in compliance with this Core Principle.

## CERTIFICATIONS PURSUANT TO SECTION 5c OF THE COMMODITY EXCHANGE ACT, 7 U.S.C. §7a-2 AND COMMODITY FUTURES TRADING COMMISSION RULE 40.6, 17 C.F.R. §40.6

## I hereby certify that:

- (1) the amendments comply with the Commodity Exchange Act, and the Commission's regulations thereunder; and
- (2) concurrent with the filing of this submission, Eurex Clearing is posting a copy of this filing to its website at: <a href="http://www.eurexclearing.com/clearing-en/resources/cftc-dco-filing">http://www.eurexclearing.com/clearing-en/resources/cftc-dco-filing</a>.

## /s/ Eric Seinsheimer

By: Eric Seinsheimer

Title: US CCO, Eurex Clearing AG

Dated: August 11, 2020