

## **VIA CFTC Portal**

18 September 2015

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

Dear Mr. Kirkpatrick:

Pursuant to CFTC regulation §40.6(a), LCH.Clearnet LLC ("LCH.Clearnet"), a derivatives clearing organization registered with the Commodity Futures Trading Commission (the "CFTC"), is submitting for self-certification a Circular to SwapClear Clearing Members which describes certain changes to its Client Deposit Rate ("CDR") (see Appendix A).

## Part I: Explanation and Analysis

LCH.Clearnet pays interest on cash posted to cover Client initial margin requirements in its SwapClear service at a rate known as CDR. CDR is published in USD and is calculated by adjusting an external benchmark interest rate by a spread.

As of 15<sup>th</sup> October, 2015, the SwapClear CDR will be amended as follows:

• USD – changes from -5 to -10

# 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.

#### **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 http://www.lchclearnet.com/rules-regulations/proposed-rules-changes

## 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 owen.taylor@lchclearnet.com.

Yours sincerely,

Owen Taylor, Director, Legal LCH.Clearnet Ltd

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Appendix I LCH.Clearnet LLC - Circular

Company Circular No:	LCH.Clearnet LLC Circular No [	]
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# **Client Deposit Rate (CDR)**

LCH.Clearnet LLC ("LCH") pays interest on cash posted to cover Client initial margin requirements in its SwapClear US service at a rate known as Client Deposit Rate (CDR). USD CDR is calculated by adjusting an external benchmark interest rate by a spread.

As of 15th October 2015, and subject to regulatory approval, LCH will be amending SwapClear US's CDR as follows:

In USD, we will amend the spread to FedFunds, from its current level of -5 to a new level of -10

As a result, the new CDR rate will be:

Currency	Benchmark	Spread as of 15 <sup>th</sup> October <b>`15</b>
USD	FedFunds	-10

LCH is also adopting a new framework for future changes to CDRs. We will review the rates payable on a quarterly basis, and where changes are required, LCH will announce the changes via Member Circular with an effective date no less than 2 weeks from the date of notification.

Terms used in this circular and not defined herein shall have the meaning assigned in the Clearing House Rulebook.

## **Further information**

If you have any queries or require access to the secure website please contact Client Services at swapclearclientservices@lchclearnet.com