

**Eurex Clearing AG**  
**ECAG Rule Certification 088/18**  
**October 22, 2018**

1. The text of the proposed amendments to the Clearing Conditions of Eurex Clearing (“Clearing Conditions”) is appended as Attachment A. Any additions are underlined and any deletions are struck through.
2. The date of intended implementation is November 12, 2018.
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: <http://www.eurexclearing.com/clearing-en/resources/cftc-dco-filing>.
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.

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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 amendments to the Clearing Conditions relating to the reporting requirements of Part 45 of the CFTC Regulations. Part 45 and related CFTC guidance require derivatives clearing organizations (“DCOs”) to report the termination of a reportable “alpha swap” cleared by the DCO to the same swap data repository (“SDR”) to which the swap was initially reported. Thus, for trade submissions from an Approved Trade Source (“ATS”) to EurexOTC Clear, where at least one of the counterparties has a reporting obligation under Part 45, Eurex Clearing as a DCO is required to report the termination of the “alpha swap.” The proposed amendments provide that, in the event that the ATS does not submit the relevant information automatically to Eurex Clearing, Clearing Members that have a reporting obligation under Part 45 will be responsible for providing Eurex Clearing with the following information:

- Source System Trade ID (Trade ID provided by the ATS prior to submission to EurexOTC Clear, e.g., Tradeweb Trade ID);
- USI Prefix (Namespace of the Unique Swap Identifier – a unique code that identifies the registered entity creating the original (alpha) swap);
- USI Value (Transaction Identifier that uniquely identifies the original (alpha) swap); and
- LEI SDR (Legal Entity Identifier of the original SDR)

The required information must be sent in a csv-file to [TransactionManagement@eurexclearing.com](mailto:TransactionManagement@eurexclearing.com) on the same business day the trade was submitted for clearing to EurexOTC Clear.

Further information regarding the operation, purpose, and effect of the proposed amendments is discussed in the attached Eurex Clearing Circular 088/18, which is appended as Attachment A.

Eurex Clearing has identified the following DCO Core Principle as potentially being relevant to the above amendments:

1. DCO Core Principle J (Reporting): The proposed amendments will comply with DCO Core Principle J because the amendments seek to ensure compliance with Eurex Clearing's reporting obligations as a registered DCO.

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: <http://www.eurexclearing.com/clearing-en/resources/cftc-dco-filing>.



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Dated: October 22, 2018