

VIA CFTC PORTAL

31 October 2018

Mr Christopher Kirkpatrick
Commodity Futures Trading Commission
115 21st Street NW
Three Lafayette Centre
Washington DC 20581

LCH Limited Self-Certification: Extension of LCH Spider

Dear Mr Kirkpatrick

Pursuant to CFTC regulation §40.6(a), LCH Limited (“LCH”), a derivatives clearing organization registered with the Commodity Futures Trading Commission (the “CFTC”), is submitting for self-certification changes to its website to include further interest rate derivative products as eligible for portfolio margining with SwapClear products (LCH Spider). The newly eligible products will be long gilt, 2-year Schatz, 3-5-year Bobl, 10-year Bunds and three month CurveGlobal SONIA Futures.

Part I: Explanation and Analysis

The proposed changes will include all CurveGlobal interest rate derivatives products as being eligible for portfolio margining with SwapClear products. LCH currently clear these products in its Listed Rates service for contracts traded on CurveGlobal via the London Stock Exchange Derivatives Market (LSEDM). LCH previously self-certified the non-CurveGlobal SONIA products within the September 28, 2017 40.6 certification filed with the CFTC that had an intended go-live date of December 4, 2017. However, LCH has not yet made those products eligible for portfolio margining with SwapClear products. This will now occur as part of service release 10.1 in addition to making the three month CurveGlobal SONIA Futures contracts eligible for portfolio margining.

The changes will go live on, or after, November 19, 2018.

Part II: Description of Rule Changes

There are no rule changes associated with this amendment however LCH will update its website to make clear that all CurveGlobal contracts are now eligible for portfolio margining.

The text of the changes to the LCH website is attached hereto as **Appendix I**.

Part III: Core Principle Compliance

LCH has reviewed the changes against the requirements of the Core Principles, and finds that they will continue to comply with all the requirements and standards therein.

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 the rule.

Certification

LCH hereby certifies to the Commodity Futures Trading Commission, pursuant to the procedures set forth in the 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.

Yours sincerely



Julian Oliver
Chief Compliance Officer
LCH Limited

Appendix I
LCH Website

<https://www.lch.com/index.php/services/swapclear/enhancements/lch-spider>

What trades are eligible?

~~Short Term Interest Rate Futures (STIRs) are now available for offset against all cleared OTC products. Bond Futures will follow (subject to regulatory approval).~~

All Curve Global Contracts (<https://www.lch.com/index.php/services/listed-rates/curveglobalr>) are now available for offset against a full range of OTC instruments