

Eurex Clearing AG
ECAG Rule Certification—DCO Compliance Manual Amendments
December 7, 2020

1. The text of the proposed amendments to the Eurex Clearing AG (“**Eurex Clearing**”) DCO Compliance Manual (the “**Manual**”) is appended as Attachment A. Any additions are underlined and any deletions are struck through.
2. The date of intended implementation of the proposed amendments is ten business days following the filing of this submission.
3. Attached please find a certification that: (1) these rules 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 with redactions for confidential information to its website at: <https://www.eurex.com/ec-en/rules-regs/regulations/cftc-dco-filings>.
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 pursuant to CFTC Regulation 40.8(c) is requested for Attachment A, which is the Manual and the revisions thereto. Please see attached letter for detailed written justification.**

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 Manual:

1. Revisions to the Manual to reflect the CFTC Final Rule, Derivatives Clearing Organization General Provisions and Core Principles, 85 Fed. Reg. 114 (June 12, 2020).
2. Corrections of references to the obsolete Individual Clearing Model and client categories—Registered Customer and Non-Clearing Member—to the current Individual Segregated Account Model and Disclosed Client categories.
3. Corrections to reflect Eurex Clearing’s permission to clear for U.S. clients of Futures Commission Merchants and implementation of Eurex Clearing’s LSOC model.
4. Other non-substantive amendments.

Eurex Clearing identifies that the proposed amendments to the Manual related to most of the DCO Core Principles and accompanying regulations, because the CFTC’s Final Rule, Derivatives Clearing Organization General Provisions and Core Principles, 85 Fed. Reg. 114 (June 12, 2020) has amended most of the DCO Core Principles and accompanying regulations.

Confidential Treatment Requested by Eurex Clearing AG

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 amended Rule complies 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 with redactions for confidential information to its website at:
<http://www.eurexclearing.com/clearing-en/resources/cftc-dco-filing>.

/s/ Eric Seinsheimer

By: Eric Seinsheimer

Title: US Compliance Officer, Eurex Clearing AG

Dated: December 7, 2020