

# DTCC Data Repository

December 13, 2024

## By Electronic Submission

Mr. Christopher J. Kirkpatrick  
Secretary  
Commodity Futures Trading Commission  
1155 21<sup>st</sup> Street, N.W.  
Washington, D.C. 20581  
DDR Rule Filing: DDR29

**Re: Amendments to DTCC Data Repository (U.S.) LLC Fee Schedule for CFTC Reporting (“Fee Schedule”) Pursuant to Section 5c(c) (1) of the Commodity Exchange Act and Commission Regulation § 40.6**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended, and Commodity Futures Trading Commission (the “Commission”) Regulation § 40.6, DTCC Data Repository (U.S.) LLC (“DDR”) submits, by written certification, amendments to the Fee Schedule for the period starting on January 1, 2025.

The newly revised fee schedule continues to comply with CFTC Regulation § 49.27(b)(1), which states that any fees or charges imposed by a registered SDR shall be equitable and established in a uniform and nondiscriminatory manner. In addition to general edits to improve clarity and usability, DDR has amended the Fee Schedule to: (i) reduce base Position Maintenance Fee rates across multiple fee bands in the FX, Commodities, Credit, Equity, and Interest Rate asset classes; and (ii) remove the Long-Term Commitment option. These changes are intended to reduce base Position Maintenance Fee rates and simplify DDR’s CFTC billing structure to reduce operational complexity. Fees will continue to be applied in a uniform and nondiscriminatory manner such that all similarly situated users pay the same fees and the updated fee schedule will be made publicly available on DDR’s website.

DDR certifies that these amendments comply with the Commodity Exchange Act and the rules and regulations promulgated by the Commission thereunder. No substantive opposing views have been expressed by Users or others with respect to the amendments. DDR further certifies that, concurrent with this filing today, a copy of this submission was posted on its website and may be accessed at: <https://www.dtcc.com/legal/sec-rule-filings?subsidiary=DerivSERV&pgs=1>. DDR intends to implement this amended Fee Schedule on January 1, 2025.

Enclosed with this letter are a clean and marked copies of the Fee Schedule. If you have any questions or need further information, please contact me at 813 470-1447.

Sincerely,



Kyle Romig  
Executive Director and Associate General Counsel

Enclosures