

#### VIA EMAIL TO: SUBMISSIONS@CFTC.GOV

25 February 2014

Ms. Melissa Jurgens Commodity Futures Trading Commission 1155 21<sup>st</sup> Street NW Three Lafayette Centre Washington DC 20581

Dear Ms. Jurgens:

Pursuant to CFTC regulation §40.6(a), LCH.Clearnet Limited ("LCH.Clearnet"), a derivatives clearing organization registered with the Commodity Futures Trading Commission (the "CFTC"), is submitting for self-certification a new schedule of Securities Acceptable for Margin Cover Purposes (the "Schedule") to be implemented starting on 11 March 2014.

The submission cover sheet and Schedule are attached hereto as appendices.

#### Part I: Explanation and Analysis

LCH.Clearnet proposes to implement the new Schedule following a standard quarterly review of haircuts applied to margin collateral. The revised Schedule provides for separate haircuts for conventional bonds and inflation-linked bonds ("ILBs"), whereas these haircuts were previously combined. This change benefits members who post conventional bonds as it separates the higher haircuts on ILBs.

The new Schedule will be notified via a circular to Clearing Members prior to the implementation date and the changes will not affect the list of acceptable securities.

## Part II: Amendments to the Rules and Regulations of LCH.Clearnet

No rule changes are required.

#### Part III: Core Principle Compliance

LCH.Clearnet will continue to comply with all Core Principles following the implementation of this Schedule. The introduction of this new Schedule will ensure continued compliance with the Core Principles, in particular Core Principle D (Risk Management) and L (Public Information).

#### Part IV: Public Information

LCH.Clearnet has posted a notice of pending certification with the CFTC and a copy of the submission on LCH.Clearnet's website at: <a href="http://www.lchclearnet.com/rules">http://www.lchclearnet.com/rules</a> and <a href="mailto:regulations/ltd/default.asp">regulations/ltd/default.asp</a>.

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LCH.Clearnet Group Limited | LCH.Clearnet Limited | LCH.Clearnet SA | LCH.Clearnet LLC



#### 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 the rule.

#### Certification

LCH.Clearnet Limited 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@lchclearnet.com

Yours sincerely,

Oliver, Director Compliance and Public Affairs

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## Appendix I

**Submission Cover Sheet** 



# Appendix II

**Securities Acceptable for Margin Cover Purposes** 

# LTD - Margin Collateral Haircut Schedule

11 March 2014

Gov	vernment Securities (Description & Bloomberg Code)	Term	Base Haircut	ILB Add-On	Change (Conventional Bonds)	Change (ILBs)
Australia	Australian Treasury Bill (ACTB) Australian Government Bond (ACGB) Australian Government I/L (ACGB)	11 business days <= 1yr > 1yr <= 3yrs > 3yrs <=7 yrs > 7yrs <= 11yrs > 11yrs <= 30yrs > 30yrs	0.63% 1.00% 2.25% 2.75% 4.25% 4.25%			
Austria	Austrian Treasury Bill (RATB) Austrian Government Bond (RAGB)	4 business days <= 1yr > 1yr <= 3yrs > 3yrs <=7 yrs > 7yrs <= 11yrs > 11yrs <= 30yrs > 30yrs	0.25% 1.00% 2.75% 3.00% 6.50%			
Belgium	Belgian Treasury Bill (BGTB) Belgian Government Bond (BGB)	4 business days <= 1yr > 1yr <= 3yrs > 3yrs <= 7 yrs > 7yrs <= 11yrs > 11yrs <= 30yrs > 30yrs	1.25% 3.00% 6.00% 7.75% 10.50%			
Canada	Canadian Treasury Bill (CTB) Canadian Government Bond (CAN) Canada Government Real Return Bond (CAN)	10 calendar days <= 1yr > 1yr <= 3yrs > 3yrs <=7 yrs > 7yrs <= 11yrs > 11yrs <= 30yrs > 30yrs	0.25% 0.88% 1.63% 2.25% 4.00%	1.00% 4.00% 4.00%	-1.00% -4.00% -4.00%	
Denmark	Danish Treasury Bill (DGTB) Danish Government Bond (DGB) Danish Government I/L (DGBI)	6 business days <= 1yr > 1yr <= 3yrs > 3yrs <=7 yrs > 7yrs <= 11yrs > 11yrs <= 30yrs > 30yrs	0.38% 1.00% 2.00% 2.63% 4.75%		-0.38%	
Finland	Finnish Treasury Bill (RFTB) Finnish Government Bonds (RFGB)	4 business days <= 1yr > 1yr <= 3yrs > 3yrs <=7 yrs > 7yrs <= 11yrs > 11yrs <= 30yrs > 30yrs	0.25% 1.00% 2.00% 2.25% 3.75% 3.75%			
France	Bons du Trésor à Taux Fixe et Intérêt Précompté (BTF) Bons du Trésor à Taux Fixe et Intérêt Annuel (BTNS) Bons du Trésor à Taux Fixe et Intérêt Annuel I/L (BTNS) Obligations Assimilables du Trésor (FRTR) Obligations Assimilables du Trésor I/L (FRTR)	4 business days <= 1yr > 1yr <= 3yrs > 3yrs <= 7 yrs > 7yrs <= 11yrs > 11yrs <= 30yrs > 30yrs	0.50% 1.00% 2.00% 2.50% 6.00% 8.75%	0.50% 2.00% 3.00% 2.75%	-0.50% -2.00% -2.75% -2.75%	0.25%
Germany	German Treasury Bill (BUBILL) Bundesschatzanweisungen (BKO) Bundesobligationen (OBL) Bundesobligationen I/L (OBLI) Deutsche Bundesrepublik (DBR) Deutschland I/L (DBRI)	3 business days <= 1yr > 1yr <= 3yrs > 3yrs <=7 yrs > 7yrs <= 11yrs > 11yrs <= 30yrs > 30yrs	0.25% 0.88% 2.00% 2.75% 6.38% 6.38%			
Italy	Buoni Ordinari del Tesoro (BOTS) Buoni del Tesoro Poliennali (BTPS) Buoni del Tesoro Poliennali I/L (BTPS) Certificati di Credito del Tesoro (CCTS)	3 business days <= 1yr > 1yr <= 3yrs > 3yrs <=7 yrs > 7yrs <= 11yrs > 11yrs <= 30yrs > 30yrs	1.75% 3.75% 7.75% 9.50% 9.75% 9.75%			
Japan	Japanese Treasury Bill (JGTB) Japanese Treasury Discount Bill (JTDB) Japanese Government Bond (JGB)	6 business days <= 1yr > 1yr <= 3yrs > 3yrs <=7 yrs > 7yrs <= 11yrs > 11yrs <= 30yrs > 30yrs	2.00% 2.25% 4.00% 4.50% 8.75% 8.75%			

Government Securities (Description & Bloomberg Code)		Term	Base Haircut	ILB Add-On	Change (Conventional Bonds)	Change (ILBs)
		5 business days <= 1yr	0.50%			
		> 1yr <= 3yrs	1.25%			
Luxembourg	Luxembougois Government Bonds (LGB)	> 3yrs <=7 yrs	2.00%			
Luxembourg	Edizembougois Government Bonds (EGB)	> 7yrs <= 11yrs	2.88%			
		> 11yrs <= 30yrs	6.25%			
		> 30yrs	0.50% 1.25% 2.00% 2.88%			
		10 business days <= 1yr	0.25%			
		> 1yr <= 3yrs	0.88%			
Netherlands	Dutch Treasury Certificate (DTB)	> 3yrs <=7 yrs	, , , , , , , , , , , , , , , , , , ,			
Netherlanus	Dutch Government Bond (NETHER)	> 7yrs <= 11yrs				
		> 11yrs <= 30yrs	6.75%			
		> 30yrs	6.75%			
		9 business days <= 1yr	0.25%			
		> 1yr <= 3yrs	1.25%			
Norway	Norwegian Treasury Bill (NGTB)	> 3yrs <=7 yrs	2.25%			
Norway	Norwegian Government Bond (NGB)	> 7yrs <= 11yrs	3.75%			
		> 11yrs <= 30yrs	4.00%			
		> 30yrs	4.00%			
		3 business days <= 1yr	1.25%			
		> 1yr <= 3yrs	3.50%			

Cmain	Spanish Letras del Tesoro (SGLT)	> 3yrs <=7 yrs	7.75%			
Spain	Spanish Government Bond (SPGB)	> 7yrs <= 11yrs	10.25%			
		> 11yrs <= 30yrs	13.00%			
		> 30yrs	13.00%			
		4 business days <= 1yr	0.13%			
	0 11 1 7 011 (01477)	> 1yr <= 3yrs	1.00%	0.75%	-0.75%	
Sweden	Swedish Treasury Bill (SWTB) Swedish Government Bond (SGB)	> 3yrs <=7 yrs	2.50%			
Oweden	Swedish Government I/L (SGBI)	> 7yrs <= 11yrs	2.88%			
	emodisii Gorominisiik ij 2 (GGBI)	> 11yrs <= 30yrs	4.13%	0.37%		0.37%
		> 30yrs	4.13%	0.37%		0.37%
		9 business days <= 1yr	0.25%			
		> 1yr <= 3yrs	1.00%			
United Kingdom	United Kingdom Treasury Bill (UKTB) United Kingdom Gilt (UKT)	> 3yrs <=7 yrs	2.25%	1.25%	-1.25%	
Officea Kingaoiii	United Kingdom Index Linked Gilt (UKTI)	> 7yrs <= 11yrs	3.00%	2.25%	-2.25%	
	Cinica rangasin mask Emilia Sik (Citti)	> 11yrs <= 30yrs	5.50%	3.00%	-1.00%	2.00%
		> 30yrs	7.50%	1.00%	-0.75%	0.25%
		3 business days <= 1yr	0.25%			
	L. 1. 10 T	> 1yr <= 3yrs	1.38%			
United States	United States Treasury Bill (B) United States Treasury Bond (T)	> 3yrs <=7 yrs	2.75%	0.75%	-0.75%	
Officed States	United States Treasury Inflation Indexed Bond (TII)	> 7yrs <= 11yrs	3.50%	1.75%	-1.75%	
	omica states risasary imation indexed bond (111)	> 11yrs <= 30yrs	6.75%	4.50%	-1.00%	3.50%
		> 30yrs	6.75%	4.50%	-1.00%	3.50%

	GNMA Mortgage Backed Securities (Description & Bloomberg Code)	Term Since Issue	Base Haircut
		New (0 - 30 months)	12.00%
US MBS	General National Mortgage Association (GNMA)	Medium (30- 60 months)	14.50%
		Seasoned (> 60 months)	N/a

Change	

	Government Agencies (Description & Bloomberg Code)	Term	Base Haircut
		3 business days <= 1yr	0.75%
	Federal National Mortgage Association (FNMA)	> 1yr <= 3yrs	1.50%
US Agencies	Federal Home Loan Mortgage Corporation (FHLMC)	> 3yrs <=7 yrs	4.00%
	Federal Home Loan Banks (FHLB)	> 7yrs <= 11yrs	5.00%
		> 7yrs <= 11yrs > 11yrs <= 30yrs	8.25%
		3 business days <= 1yr	0.63%
	14 Fr 1 14 Fr 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	> 1yr <= 3yrs	1.25%
EUR Agencies	Kreditanstalt für Wiederaufbau (KFW) FMS Wertmanagement (FMSWER)	> 3yrs <=7 yrs	2.25%
	FWS Wertmanagement (FWSWER)	> 7yrs <= 11yrs	2.63%
		> 11yrs <= 30yrs	6.63%

Change

	Securities issued under Government Credit Guarantee Schemes	Term	Base Haircut
Australia	Government Guaranteed Bonds	3 business days <= 1yr > 1yr <= 3yrs > 3yrs <= 7 yrs	1.25% 3.00%
Austria	Government Guaranteed Bonds	3 business days <= 1yr > 1yr <= 3yrs > 3yrs <=7 yrs	1.00% 3.25%
France	Government Guaranteed Bonds	3 business days <= 1yr > 1yr <= 3yrs > 3yrs <=7 yrs	1.00% 4.00%
Germany	Government Guaranteed Bonds	3 business days <= 1yr > 1yr <= 3yrs > 3yrs <=7 yrs	0.75% 2.75%
Netherlands	Government Guaranteed Bonds	3 business days <= 1yr > 1yr <= 3yrs > 3yrs <=7 yrs	0.75% 2.75%
Sweden	Government Guaranteed Bonds	3 business days <= 1yr > 1yr <= 3yrs > 3yrs <=7 yrs	0.75% 4.50%

Change

	Other Stipulations				
Haircuts  To capture the potential FX exposure related to cover being provided in a currency other than the undial haircut will be applied upon all securities, regardless of the currency of the asset.		To capture the potential FX exposure related to cover being provided in a currency other than the underlying liability, a 4% incremental FX haircut will be applied upon all securities, regardless of the currency of the asset.			
		Certain collateral can at times be subject to additional haircuts above those stated. Members lodging this collateral will be contacted directly as appropriate, and further detail can be obtained by contacting CaLM Risk.			
Market of Issue		Government securities must be issued in the home country of the issuer and be denominated in the domestic currency to be acceptable.  Government agencies and securities issued under Government Credit Guarantee Schemes must both be issued in the home country of the issuer and be denominated in the domestic currency to be acceptable. These instrument categories to be maintained using ISIN lists.			
Excluded Instruments		Zero coupon bonds, stripped bonds and perpetual bonds Japanese Govt FRNs and Japanese Govt ILBs			
Concentration Controls		In addition to the concentration limits in place upon particular asset types as noted above, LCH.Clearnet reserves the right to manage specific concentrations in margin collateral in all circumstances. Where positions are considered to be excessively concentrated, members will be contacted directly with a view to re-alignment of their portfolio.			

Other Collateral (Description & Bloomberg Code)		Term	Haircut
Precious Metals	Gold Bullion (XAU)		14.00%