



CONFIDENTIAL TREATMENT
REQUESTED

VIA EMAIL TO: SUBMISSIONS@CFTC.GOV

May 5, 2014

Ms. Melissa Jurgens
Commodity Futures Trading Commission
1155 21st 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 changes to the SwapClear Service margin model to add a margin floor. LCH.Clearnet notes that while this change will not result in any change to the LCH.Clearnet Rules and Regulations, it is within the definition of a "Rule" as contained in §40.1(i) and is therefore being submitted for the Commission's review.

Please find attached as an appendix a note setting out the calculation and implementation of the margin floor.

Part I: Explanation and Analysis

SwapClear's current model for initial margin uses expected shortfall over a 10 year look back and mid volatility scaling calibrated to a 99.7% confidence. As at April 2014, the current margin model performed to a 99.9% level of confidence over an 18 month business backtesting lookback.

LCH.Clearnet plans to make a change to the scaling model for historical scenarios to limit pro-cyclical effects.

LCH.Clearnet plans to implement the SwapClear margin floor on May 19, 2014 for margin calls made on May 20, 2014.

Part II: Description of Rule Changes

No changes to the LCH.Clearnet Limited Rulebook or FCM Rulebook, Regulations and Procedures are required to implement the LCRM.

Part III: Certification by LCH.Clearnet

LCH.Clearnet certifies to the CFTC, in accordance with CFTC Regulation §40.6, that the planned changes comply with the Commodity Exchange Act and the CFTC Regulations promulgated thereunder.

LCH.Clearnet Limited Aldgate House, 33 Aldgate High Street, London EC3N 1EA
Tel: +44 (0)20 7426 7000 Fax: +44 (0)20 7426 7001 www.lchclearnet.com
LCH.Clearnet Group Limited | LCH.Clearnet Limited | LCH.Clearnet SA | LCH.Clearnet LLC



LCH.Clearnet further certifies that, upon the submission of this material, in compliance with §39.21 of the Commission's regulations, LCH.Clearnet will post a notice of pending certification with the CFTC and a copy of the submission, excluding the appendix, on LCH.Clearnet's website at http://www.lchclearnet.com/rules_and_regulations/ltd/proposed_rules.asp

Part IV: Core Principle Compliance

LCH.Clearnet will continue to comply with all Core Principles following the introduction of the proposed changes to the SwapClear Margin Model. LCH.Clearnet has concluded that its compliance with the Core Principles would not be adversely affected by these changes, in particular Core Principle D. The introduction of the margin floor based on unscaled returns over a ten year lookback is intended to reduce the likelihood of pro-cyclical effects on margin requirements.

Part V: Public Information

LCH.Clearnet, in accordance with Commission Regulation 145.9(d), has respectfully requested confidential treatment under the Freedom of Information Act (the "FOIA"), 5 U.S.C. § 552, for the Appendix to this self-certification submission, including subsequent emails and replies between LCH.Clearnet and Commission staff regarding the introduction of the margin floor. As such the copy of the self-certification submission published on LCH.Clearnet's public website omits the Appendix.

Part VI: 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 this proposal.

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,

A handwritten signature in black ink, appearing to read "Julian Oliver".

Julian Oliver, Director, Compliance and Public Affairs
LCH.Clearnet Limited

VIA EMAIL TO: FOIAsubmissions@cftc.gov

May 5, 2014

US Commodity Futures Trading Commission
Attention: FOIA Compliance Office
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

CONFIDENTIAL TREATMENT
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RE: FOIA Request for Confidential Treatment

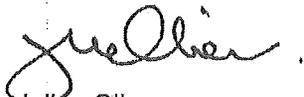
Dear Sir/Madam:

In accordance with Commission Regulation 145.9(d), LCH.Clearnet Limited ("LCH.Clearnet") respectfully requests confidential treatment under the Freedom of Information Act (the "FOIA"), 5 U.S.C. § 552, for the Appendix to its self-certification submission dated May 5, 2014, including any subsequent emails and replies between LCH.Clearnet and Commission staff, regarding the introduction of a margin volatility floor for SwapClear initial margin (the "Information").

LCH.Clearnet is requesting confidential treatment for the Information pursuant to Commission Regulation 145.9(d)(ii), which provides that confidential treatment may be requested on the grounds that disclosure would reveal trade secrets or confidential commercial or financial information. LCH.Clearnet further requests that the Information receives confidential treatment in perpetuity.

This request is not to be construed as a waiver of any other protection from disclosure or confidential treatment accorded by law, and LCH.Clearnet will rely on and invoke any such confidentiality protection. LCH.Clearnet requests notification from the Commission in advance of any disclosure of the Information pursuant to the FOIA or the Commission's Rules of Practice so that this request for confidential treatment may be substantiated.

Sincerely yours,



Julian Oliver
Director, Compliance and Public Affairs
LCH.Clearnet Limited