



**KANSAS CITY  
BOARD OF TRADE**  
**CLEARING CORPORATION**

February 7, 2011

SENT VIA AGENCY WEBSITE

Mr. David Stawick  
Secretary of the Commission  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, N.W.  
Washington, D.C. 20581

Re: Swap Data Recordkeeping and Reporting Requirements RIN 3038-AD19

Dear Mr. Stawick:

In response to your request for public comment on Swap Data Recordkeeping and Reporting Requirements, the Kansas City Board of Trade Clearing Corporation ("KCC") offers the following:

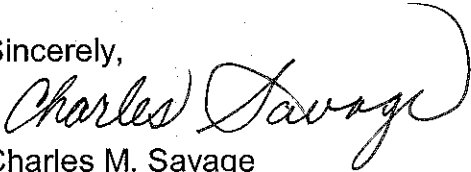
Proposed Regulation 45.3 (a)(1)(iii)(B) Reporting of confirmation data, for swaps not executed on a SEF or DCM but cleared on a DCO.

KCC is of the opinion that the electronic confirmation by DCO's of a full, signed, legal confirmation by the counterparties of all the terms of a swap to an SDR is a costly, burdensome and excessive requirement, particularly in comparison to information normally obtained for futures/options transactions. Given that the primary economic terms data is already required to be submitted by the swap dealer or major swap participant, DCOs should only be required to submit to an SDR the matched trade records compiled during the normal DCO clearing process similar to what is gathered and reported to the Commission for futures/options transactions. Further, DCOs should be allowed to electronically transmit confirmation of cleared swaps transactions to an SDR in a daily data file similar to the submission of daily futures/options trade data files to the Commission.

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Kansas City Board of Trade Clearing Corporation appreciates the opportunity to comment on the Swap Data Recordkeeping and Reporting Requirements currently being proposed. If you have any questions please feel free to contact me at 816-931-8964 or [csavage@kcbt.com](mailto:csavage@kcbt.com).

Sincerely,

A handwritten signature in cursive script that reads "Charles Savage". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Charles M. Savage  
Assistant Vice President and Manager