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By Electronic Mail

August 3, 2011

Mr. David A. Stawick
Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street NW
Washington, D.C. 20581

Re: Financial Resources Requirements for Derivatives Clearing Organizations (75 Fed. Reg. 63113 (October 14, 2010)) and Information Management Requirements for Derivatives Clearing Organizations (75 Fed. Reg. 78185 (December 15, 2010))

Dear Mr. Stawick:

Pursuant to discussions with staff of the Commodity Futures Trading Commission (the "Commission") on July 29, 2011 regarding the comment letter submitted by New York Portfolio Clearing, LLC ("NYPC") on June 3, 2011 with respect to the above referenced proposed rulemakings (the "June 3, 2011 Letter"), NYPC submits the following supplemental comments regarding proposed regulation 39.19(c)(4)(i).

Proposed regulation 39.19(c)(4)(i) would require timely reporting by a derivatives clearing organization ("DCO") if there is a decrease of 10 percent in the total value of the financial resources required to be maintained by the DCO under proposed regulation 39.11(a). In the June 3, 2011 Letter, NYPC had preliminarily estimated that designing, building and testing the application required to automatically capture and combine NYPC's default risk financial resources and operating financial resources in a single daily calculation for purposes of satisfying the reporting requirements of proposed regulation 39.19(c)(4)(i) would require approximately **15,000 hours and \$1.7 million**.

Commission staff requested that NYPC submit an updated estimate regarding the time and resources that would be required to comply with the reporting requirements under proposed regulation 39.19(c)(4)(i), to the extent that such reporting requirements applied only to the default risk financial resources included under proposed regulation 39.11(a)(1).

NYPC has preliminarily estimated that designing, building and testing such an application, to the extent the reporting requirements under proposed regulation 39.19(c)(4)(i) applied only to the



default risk financial resources included under proposed regulation 39.11(a)(1), would require approximately **4600 hours and \$566,000**—approximately **one-third** the time and resources that would be required for NYPC to design, build and test the application required to automatically capture and combine NYPC's default risk financial resources and operating financial resources in a single daily calculation.

* * *



NYPC appreciates the opportunity to submit these comments in connection with the proposed regulations. If the Commission has any questions concerning the matters discussed in this letter, please contact the undersigned (at 212-855-5210 or wlukken@nypclear.com) or Laura C. Klimpel, NYPC's Chief Compliance Officer and Counsel (at 212-855-5230 or lklimpel@nypclear.com).

Very truly yours,

A handwritten signature in blue ink that reads "Walt L. Lukken".

Walter Lukken
Chief Executive Officer

cc: Honorable Gary Gensler, CFTC Chairman
Honorable Michael Dunn, CFTC Commissioner
Honorable Jill E. Sommers, CFTC Commissioner
Honorable Bart Chilton, CFTC Commissioner
Honorable Scott O'Malia, CFTC Commissioner

Division of Clearing and Intermediary Oversight
John C. Lawton, Deputy Director and Chief Counsel
Phyllis P. Dietz, Associate Director
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