



Via Electronic Submission

Christopher Kirkpatrick
Secretary of the Commission
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

January 27, 2020

Re: Proposed Amendments to the Commission's Regulations Relating to Certain Swap Data Repository and Data Reporting Requirements (RIN 3038-AE32)

Dear Mr. Kirkpatrick,

Eurex Clearing AG ("**Eurex Clearing**") appreciates the opportunity to provide comments to the U.S. Commodity Futures Trading Commission ("**CFTC**" or "**Commission**") regarding the Commission's Notice of Proposed Rulemaking: Certain Swap Data Repository and Data Reporting Requirements published on May 13, 2019 ("**Proposal**").¹

Eurex Clearing welcomes the Commission's efforts to amend its regulations to improve the accuracy of data reported to, and maintained by, swap data repositories ("**SDRs**") and recognizes the importance of the Commission having access to correct and reliable data. The Proposal seeks to identify alternatives to improve the accuracy of data reported to, and maintained by, SDRs by introducing new requirements for SDRs and reporting counterparties to verify swap data. Eurex Clearing believes there are more proportionate ways to achieve this goal and that no further verification requirements should be implemented before other measures are exhausted.

Eurex Clearing supports the FIA's comment letter dated August 27, 2019 and provides the following additional comment. The Proposal includes a new regulatory framework for reporting parties to verify data reported to an SDR. From Eurex Clearing's perspective, the initial focus should be to streamline and evaluate data fields, i.e., to specify which key data fields are needed by the Commission to perform its oversight function and to harmonize all data fields with foreign regulators to the extent possible. Eurex Clearing believes that by providing a single source of required and clearly defined data fields (e.g. directly in an appendix to Part 45 of the CFTC Regulations), this can remove the uncertainty as to what must be reported. This would allow the CFTC to focus on data fields that are crucial for its oversight function and not on all possible data that is connected to each swap transaction. Reducing the number of data fields while specifying clearly the expected content of such data fields would immediately lead to higher-quality data and streamline reporting in general. We

¹ 17 CFR Parts 23, 43, 45, and 49 Certain Swap Data Repository and Data Reporting Requirements, Notice of Proposed Rulemaking, 84 Fed. Reg. 21044 (May 13, 2019), <https://www.cftc.gov/sites/default/files/2019/05/2019-08788a.pdf>.



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believe this would serve the goal of improving data accuracy and completeness to the highest degree possible.

In conjunction with the focus on data fields, a complementary way to serve this goal is to evaluate the allocation of certain reporting requirements within Part 45 of the CFTC Regulations as a whole. As stated before in the initial consultation paper on the "Roadmap to Achieve High Quality Swaps Data"², a derivatives clearing organization ("DCO") is dependent on the provision of data from middleware providers. For example, such middleware providers provide the DCO with the trades for clearing, thus playing a crucial role in offering counterparties to a trade the respective data fields with which the reporting counterparty can then report all necessary information. In case the middleware providers do not offer the respective data fields, the receipt of complete and accurate information on the level of the reporting counterparty is jeopardized, which decreases the quality of reporting.

At a subsequent stage of the above process, Eurex Clearing is supportive of leveraging and extending existing SDR validation processes to improve the accuracy and completeness of the data stored at the SDR level. By doing so, the Commission should take into consideration that there are existing validation processes with SDRs as well as existing requirements to correct errors.³ If additional requirements and processes are deemed necessary at that time, there would then be a need to define precise and industry-wide requirements, e.g., timing, formatting etc., of such processes.

In conclusion, Eurex Clearing reiterates its appreciation for the opportunity to comment on the Proposal and looks forward to working with the Commission on other proposals and initiatives.

Yours faithfully,



Eric Seinsheimer
US CCO
Eurex Clearing AG

² Eurex Clearing's Comment Paper on the "Roadmap to Achieve High Quality Swaps Data" issued in July 2017, <https://comments.cftc.gov/PublicComments/ViewComment.aspx?id=61278&SearchText>.

³ 17 CFR 45.14.