

Please note that the comments expressed herein are solely my personal views

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- **17 CFR Parts 36, 37 and 43**
- **RIN Number 3038-AE94**
- **Swap Execution Facility Requirements and Real-Time Reporting Requirements**

Dear Mr. Kirkpatrick.

Thank you for giving us the opportunity to comment on your notice of proposed rulemaking on Swap Execution Facility Requirements and Real-Time Reporting Requirements.

The Commodity Futures Trading Commission (CFTC) proposes to amend certain parts of its regulations relating to the execution of package transactions on swap execution facilities (SEFs); the execution of block trades on SEFs; and the resolution of error trades on SEFs. These matters are currently the subject of relief in certain no-action letters from CFTC staff.

I strongly support the CFTC's proposed definition of "block trade" in § 43.2 that allows SEFs to offer non-order book methods of executing block trades on SEFs. The proposal will promote swaps trading on SEFs, increase market integrity and improve operational efficiency, with no loss of regulatory amenity.

Yours sincerely

C.R.B.

Chris Barnard