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Commodity Futures Trading Commission  
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- **17 CFR Parts 45, 46 and 49**
- **RIN Number 3038-AE31**
- **Swap Data Recordkeeping and Reporting Requirements**

Dear Mr. Kirkpatrick.

Thank you for giving us the opportunity to comment on your notice of proposed rulemaking on Swap Data Recordkeeping and Reporting Requirements.

The Commodity Futures Trading Commission (CFTC) is proposing revisions to its regulations that set forth the swap data recordkeeping and reporting requirements for swap data repositories (SDRs), derivatives clearing organizations (DCOs), swap execution facilities (SEFs), designated contract markets (DCMs), swap dealers (SDs), major swap participants (MSPs), and swap counterparties that are neither SDs nor MSPs. The CFTC is proposing revisions that, among other things, streamline the requirements for reporting new swaps, define and adopt swap data elements that harmonize with international technical guidance, and reduce reporting burdens for reporting counterparties that are not SDs or MSPs.

I strongly support these proposals that will simplify swap data reporting requirements and harmonize them with those of the SEC and ESMA. This will improve the quality of swap data reporting and reduce the burden on reporting entities by eliminating duplication and clarifying and streamlining data requirements.

I also support proposals that require the reporting of uncleared margin data. This will provide clearer and enhanced information to regulators that will improve overall monitoring of systemic risk.

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

### Swap recordkeeping

§ 45.2 establishes the swap recordkeeping requirements. I would recommend that records should be required to be kept by DCOs, DCMs, SEFs, SDs, MSPs, and non-SD/MSP swap counterparties indefinitely following the final termination of the swap rather than the currently required period of “at least five years” following the final termination of the swap. There is no technological or practical reason for limiting this period, and it would be useful to keep this information for future analytical purposes.

Yours sincerely

C.R.B.

Chris Barnard