

Christopher Kirkpatrick, Secretary
Commodity Futures Trading Commission
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- **17 CFR Parts 39 and 140**
- **RIN Number 3038-AF12**
- **Reporting and Information Requirements for Derivatives Clearing Organizations**

Dear Mr. Kirkpatrick.

Thank you very much for giving us the opportunity to comment on your notice of proposed rulemaking on Reporting and Information Requirements for Derivatives Clearing Organizations.

The Commodity Futures Trading Commission (CFTC) is proposing to amend certain reporting and information regulations applicable to derivatives clearing organizations (DCOs). These proposed amendments would, among other things, update information requirements associated with commingling customer funds and positions in futures and swaps in the same account, address certain systems-related reporting obligations regarding exceptional events, revise certain daily and event-specific reporting requirements, and include in an appendix the fields that a DCO is required to provide on a daily basis. In addition, the CFTC is proposing to amend certain delegation provisions.

I generally agree with the comingling proposals, which should improve the quality of submissions to the CFTC and allow the CFTC to properly assess the risks that commingling of customer funds may pose. This will enhance protection of customer assets and increase market integrity. The proposals also shorten and simplify compliance by eliminating extraneous reporting and focusing submissions on relevant and salient information.

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

I also support the proposed requirement that DCOs include in their daily reports the key information and results of the margin model back testing that they are required to perform daily pursuant to § 39.13(g)(7)(i). This proposal will improve the CFTC's oversight of DCOs and should work to increase the accuracy, relevance, and effectiveness of DCOs' margin calculations.

Yours sincerely

C.R.B.

Chris Barnard