



Commodity Markets Council  
600 Pennsylvania Ave SE  
Suite 300  
Washington, DC 20003  
Tel 202-842-0400  
[www.commoditymks.org](http://www.commoditymks.org)

April 11, 2024

*Via Electronic Submission*

Christopher Kirkpatrick  
Secretary of the Commission  
U.S. Commodity Futures Trading Commission  
Three Lafayette Centre  
2255 21<sup>st</sup> Street, NW  
Washington, DC 20581

Re: Proposed Revisions to Real-Time Public Reporting Requirements and Swap Data Recordkeeping and Reporting Requirements

Dear Mr. Kirkpatrick:

The Commodity Markets Council (CMC) is the leading Washington, DC based trade association that brings together commodity exchanges with their agriculture and energy trading counterparts. CMC members represent the complete spectrum of commercial users of all futures markets including agriculture, energy, metals, and financials. CMC's unique combination of exchange members, along with the primary users of agricultural and energy derivatives markets, represents an "end-user" perspective to U.S. and European policy makers regarding the importance of efficient markets and competitive risk management products.

CMC appreciates the opportunity to submit this letter in response to the Commodity Futures Trading Commission's (CFTC or Commission) request for comment on its Notice of Proposed Rulemaking, Real-Time Public Reporting Requirements and Swap Data Recordkeeping and Reporting Requirements (Proposed Rule). The CMC hereby adopts and incorporates the comments submitted by The Commercial Energy Working Group (CEWG)<sup>1</sup> as its own and files this letter in support of the CEWG comments.

---

<sup>1</sup> [CEWG Comment Letter](#)



Commodity Markets Council  
600 Pennsylvania Ave SE  
Suite 300  
Washington, DC 20003  
Tel 202-842-0400  
[www.commoditymks.org](http://www.commoditymks.org)

CMC shares the CEWG's belief that this rule, if adopted, would impose significant burdens on end-users, and would force them to adopt new processes and systems to comply with reporting requirements. The CFTC should repropose a less burdensome rule to address reporting concerns and allow further review and comment by market participants.

CMC appreciates the Commission's consideration of our views on this rule proposal.

Sincerely,

A handwritten signature in blue ink that reads 'Kevin Batteh'.

**Kevin Batteh**

General Counsel

Commodity Markets Council

[Kevin.Batteh@CommodityMkts.org](mailto:Kevin.Batteh@CommodityMkts.org)

600 Pennsylvania Ave SE, Suite 300

Washington, D.C. 20003

