

Via CFTC Portal

4th May 2016

Mrs. Parisa Abadi

Commodity Futures Trading Commission
1155 21st Street NW
Three Lafayette Centre
Washington DC 20581

Dear Mrs. Abadi,

Pursuant to CFTC regulation §40.6(a), LCH.Clearnet SA ("**LCH**"), a derivatives clearing organization registered with the Commodity Futures Trading Commission (the "**CFTC**"), is submitting for self-certification some amendments to the CDS Clearing Rules and the Access Agreement (the "**Rules**") related to the means of access to the CDSClear Clearing System reports and files.

The submission changes made to the Rules are attached hereto as Appendix.

Part I: Explanation and Analysis

On November 2nd 2015, CDSClear self certified with the CFTC the migration from the LCAP to the new SFTP solution onto CDS Portal in order to harmonize CDS members access tools. LCH Clearnet has issued a Clearing Notice named "Means of Access and Reporting mechanism", listing the means of access that were made available to CDS clearing members.

The clearing notice "Means of Access and Reporting mechanism" is being modified to remove the mention to LCAP technology as a mean of access to CDS Clearing System reports and files.

Part II: Description of Rule Changes

The removing of the LCAP solution on 2nd May 2016 requires the Clearing Notice "Means of Access and Reporting Mechanism" to be slightly modified as specified in Appendix.

Part III: Core Principle Compliance

LCH will continue to comply with all Core Principles following the introduction of this change and has concluded that its compliance with the Core Principles would not be adversely affected by this change.

Part IV: Public Information

LCH has posted a notice of pending certifications with the CFTC and a copy of the submission on LCH's website at:

<http://www.lchclearnet.com/rules-regulations/proposed-rules-changes>

Part V: Opposing Views

There were no opposing views expressed to LCH by governing board or committee members, members of LCH that were not incorporated into the rule.

Certification

LCH hereby certifies to the Commodity Futures Trading Commission, pursuant to the procedures set forth in the Commission regulation § 40.6, that attached rule submission complies with the Commodity Exchange Act, as amended, and the regulations promulgated there under.

Should you have any questions please contact me at: françois.faure@lchclearnet.com.



Francois Faure
Chief Compliance Officer
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APPENDIX

Clearing Notice – CDSClear – Means of access and reporting mechanism

Clearing Notice

2016/[●]

Published on [●] 2016

Effective from [●] 2016

CDSClear - Means of access and reporting mechanism

Pursuant to the CDS Clearing Rules, this Clearing Notice describes the following means of access made available to the Clearing Members for the purpose of having access to the CDSClear Clearing System reports and files:

- ~~the LCAP (Logical Clearing Access Point) is a virtual FTP (File Transfer Protocol) server available over a private connection accessible over the GMA (Group Member Access) solution. The LCAP is a clearing gateway hosted in LCH.Clearnet SA data centres. The LCAP supplies the users with certified access points enabling the management of data flows. Clearing reports are provided through the LCAP in a predefined format. End-users cannot generate bespoke reports. They can have access to and upload a full range of trade, risk, product, treasury and event reports;~~
- LCH.Clearnet **P**portal is a single sign-on solution for various LCH.Clearnet applications, available on the internet and secured by login and password. Through the LCH.Clearnet **P**portal, end-users have access to the **c**ollateral **m**anagement **s**ystem, the CDSClear **r**eporting, **b**ackloading, **c**ompression and **t**rade **l**ists applications. End-users can download and upload files as well as extract data through .csv files;
- the CDSClear SFTP solution is a non-browser based, secure FTP interface used by Clearing Members **F**irms for the scripted, bulk retrieval of reports on a scheduled basis. **C**learing Members connect on a frequent, automatic schedule and retrieve reports, often across multiple business line, in bulk - for later processing. This is a non-user interactive interface. Access to the CDSClear SFTP solution is made through Internet or BT Radianz connection; and
- the CDSClear **r**eporting API solution provides a programmatic interface where **C**learing **M**embers can use scripts to access and download individual reports. Access to the CDSClear **r**eporting API solution is made through Internet.

Capitalised terms used in this Clearing Notice and not otherwise defined herein shall have the meaning given pursuant to the document entitled "CDS Clearing Rule Book" published by LCH.Clearnet SA, as amended from time to time.

Any amendments or modifications to the current list of means of access will be published by LCH.Clearnet SA in an updated Clearing Notice.

LCH.Clearnet SA

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 [@LCH_Clearnet](https://twitter.com/LCH_Clearnet)

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