SUBMISSION COVER SHEET

Registered Entity Identifier Code (optional) LCHLTD   **Date**: May 8, 2014

IMPORTANT: CHECK BOX IF CONFIDENTIAL TREATMENT IS REQUESTED. ☒

ORGANIZATION	LCH.Clearnet Limited

FILING AS A: ☐ DCM   ☐ SEF   ☒ DCO   ☐ SDR   ☐ ECM/SPDC

TYPE OF FILING

- **Rules and Rule Amendments**
  - ☒ Certification under § 40.6 (a) or § 41.24 (a)
  - ☐ "Non-Material Agricultural Rule Change" under § 40.4 (b)(5)
  - ☐ Notification under § 40.6 (d)
  - ☐ Request for Approval under § 40.4 (a) or § 40.5 (a)
  - ☐ Advance Notice of SIDCO Rule Change under § 40.10 (a)
- **Products**
  - ☐ Certification under § 39.5(b), § 40.2 (a), or § 41.23 (a)
  - ☐ Swap Class Certification under § 40.2 (d)
  - ☐ Request for Approval under § 40.3 (a)
  - ☐ Novel Derivative Product Notification under § 40.12 (a)

RULE NUMBERS

No changes to the LCH.Clearnet Rules & Regulations or Procedures.

DESCRIPTION

Self-certification pursuant to §40.6(a) relating to implementation of a margin model floor for the EnClear Clearing Service.

May 8, 2014

Ms. Melissa Jurgens
Commodity Futures Trading Commission
1155 21st Street NW
Three Lafayette Centre
Washington DC 20581

Dear Ms. Jurgens,

Pursuant to CFTC regulation §40.6(a), LCH.Clearnet Limited ("LCH.Clearnet"), a derivatives clearing organization registered with the Commodity Futures Trading Commission (the "CFTC"), is submitting for self-certification changes to the EnClear Service margin model to add a margin floor. LCH.Clearnet notes that while this change will not result in any change to the LCH.Clearnet Rules and Regulations, it is within the definition of a "Rule" as contained in §40.1(i) and is therefore being submitted for the Commission's review.

Please find attached as Appendix a note setting out the calculation and implementation of the margin floor.

Part I: Explanation and Analysis

LCH.Clearnet currently applies a 12-month time horizon for the calculation of historical volatility for the EnClear service calibrated to 99.7% confidence level. As at April 2014, the current margin model performed to a 99.96% confidence level over an 18-month business backtesting lookback period.

The introduction of a 10-year margin floor (calibrated at 99% confidence interval) will ensure the data used for calculating historical volatility capture a full range of market conditions, including periods of stress.

It also ensures the margin requirements could not be lower than those calculated using SPAN margin calibrated to a 99% confidence interval calibrated over a ten year lookback period thereby limiting pro-cyclical effects. LCH.Clearnet will, as necessary, call members for additional margin to ensure that it holds margin to at least the level of the margin floor.

LCH.Clearnet plans to implement the EnClear margin floor on May 26, 2014 for margin calls made on May 27, 2014.

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LCH.Clearnet Group Limited | LCH.Clearnet Limited | LCH.Clearnet SA | LCH.Clearnet LLC

Registered in England No. 25932 Registered Office: Aldgate House, 33 Aldgate High Street

Part II: Description of Rule Changes

No changes to the LCH.Clearnet Limited Rulebook or FCM Rulebook, Regulations and Procedures are required to implement the margin floor.

Part III: Certification by LCH.Clearnet

LCH.Clearnet certifies to the CFTC, in accordance with CFTC Regulation §40.6, that the planned changes comply with the Commodity Exchange Act and the CFTC Regulations promulgated thereunder. LCH.Clearnet further certifies that, upon the submission of this material, in compliance with §39.21 of the Commission's regulations, LCH.Clearnet will post a notice of pending certification with the CFTC and a copy of the submission, excluding the appendix, on LCH.Clearnet's website at http://www.lchclearnet.com/rules_and_regulations/ltd/proposed_rules.asp

Part IV: Core Principle Compliance

LCH.Clearnet will continue to comply with all Core Principles following the introduction of the proposed changes to the EnClear Margin Model. LCH.Clearnet has concluded that its compliance with the Core Principles would not be adversely affected by these changes, in particular Core Principle D. The introduction of the margin floor based on ten year lookback is intended to reduce the likelihood of pro-cyclical effects on margin requirements.

Part V: Public Information

LCH.Clearnet, in accordance with Commission Regulation 145.9(d), has respectfully requested confidential treatment under the Freedom of Information Act (the "FOIA"), 5 U.S.C. § 552, for the Appendix to this self-certification submission, including subsequent emails and replies between LCH.Clearnet and Commission staff regarding the introduction of the margin floor. As such the copy of the self-certification submission published on LCH.Clearnet's public website omits the Appendix.

Part VI: Opposing Views

There were no opposing views expressed to LCH.Clearnet by governing board or committee members, members of LCH.Clearnet or market participants that were not incorporated into this proposal.

⟲ LCH.CLEARNET

Certification

LCH.Clearnet Limited 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 jay.iyer@lchclearnet.com or vikesh.patel@lchclearnet.com

Yours sincerely,

Jay Iyer
Chief Compliance Officer
LCH.Clearnet Limited

Appendix
LCH.Clearnet Limited EnClear margin floor description
(Confidential Treatment Requested)

⟳LCH.CLEARNET

May 8, 2014

US Commodity Futures Trading Commission
Attention: FOIA Compliance Office
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

RE: FOIA Request for Confidential Treatment

Dear Sir/Madam:

In accordance with Commission Regulation 145.9(d), LCH.Clearnet Limited ("LCH.Clearnet") respectfully requests confidential treatment under the Freedom of Information Act (the "FOIA"), 5 U.S.C. § 552, for the Appendix to its self-certification submission dated May 8, 2014, including any subsequent emails and replies between LCH.Clearnet and Commission staff, regarding the introduction of a margin volatility floor for EnClear initial margin (the "Information").

LCH.Clearnet is requesting confidential treatment for the Information pursuant to Commission Regulation 145.9(d)(ii), which provides that confidential treatment may be requested on the grounds that disclosure would reveal trade secrets or confidential commercial or financial information. LCH.Clearnet further requests that the Information receives confidential treatment in perpetuity.

This request is not to be construed as a waiver of any other protection from disclosure or confidential treatment accorded by law, and LCH.Clearnet will rely on and invoke any such confidentiality protection. LCH.Clearnet requests notification from the Commission in advance of any disclosure of the Information pursuant to the FOIA or the Commission's Rules of Practice so that this request for confidential treatment may be substantiated.

Sincerely yours,

Jay Iyer
Chief Compliance Officer
LCH.Clearnet Limited