

**VIA CFTC PORTAL SUBMISSION**

19 December 2017

Mr. Christopher Kirkpatrick  
Commodity Futures Trading Commission  
1155 21<sup>st</sup> Street NW  
Three Lafayette Centre  
Washington DC 20581

Dear Mr. Kirkpatrick:

LCH Limited ("LCH"), a derivatives clearing organization registered with the Commodity Futures Trading Commission (the "CFTC"), is submitting for self-certification, pursuant to CFTC regulation §40.6(a), a new Schedule of Securities Acceptable for Margin Cover Purposes (the "Schedule"). This change takes effect on or after 22 Jan 2018.

**Part I: Explanation and Analysis**

LCH proposes to implement this new Schedule following a review of haircuts applied to margin collateral. The list of acceptable securities remains unchanged.

The Schedule is attached hereto (as Appendix A) as a confidential submission.

The Schedule will be notified via a circular to Clearing Members prior to the implementation date<sup>1</sup>.

**Part II: Description of Rule Changes**

This submission does not require any changes to the LCH Rulebook.

**Part III: Core Principle Compliance**

LCH has concluded that compliance with the Core Principles will not be adversely impacted by this change, and in particular complies with Core Principles D and L.

**Part IV: Public Information**

LCH has posted a notice of pending certification with the CFTC and a copy of this submission on the LCH website at <http://www.lch.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 or market participants that were not incorporated into this change.

**Certification**

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

---

<sup>1</sup> The schedule is made publically available on the LCH website two months after the implementation date.

Should you have any questions regarding this submission please contact me at [julian.oliver@lch.com](mailto:julian.oliver@lch.com)

Yours sincerely,



Julian Oliver, Chief Compliance Officer

**LCH Rule Submission**

**Appendix A**

**(FOIA – Request for confidentiality)**

**Margin Collateral Haircut Schedule**