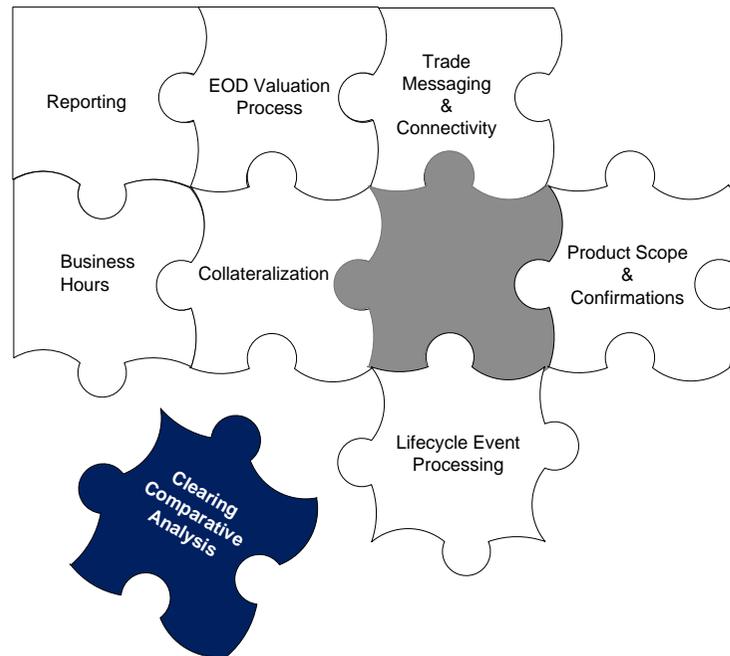


## CIG | Clearing sub-group

### CCP Snap-Shot Matrices

(Addendum to the Credit Clearing Comparative Analysis)

Version: 1.0



**Foreword**

This document contains a consolidated snap-shot of the survey responses from the 4 Central Clearing Counterparties (“CCPs”) that completed the Credit Clearing Comparative Analysis Survey circulated at the end of March 2011:

- CME Group Inc. (“CME”)
- IntercontinentalExchange, Inc. (“ICE Clear Europe” & “ICE Trust US”)
- LCH.Clearnet S.A. (“LCH”).

The content received from CCPs was used to determine the divergences detailed within the Credit Clearing Comparative Analysis publication. This document provides a useful reference point for those wishing to gain a deeper understanding of the divergences identified and should be read as an Addendum to the Credit Clearing Comparative Analysis publication.

**The following content is based on information provided by the CCPs and is restricted to information which they considered not to be proprietary or confidential. The information presented is based on CCP responses to the survey that was circulated at the end of March 2011 and the additional requests for clarification that followed. ISDA has not undertaken to review the accuracy of the information presented and does not assume any responsibility for any use to which the information may be put.**

The document is divided by work stream and each section provides a snap-shot matrix (example below) with the CCP summarised responses for each sub-module question and the associated divergence ratings. Divergence ratings assigned indicate: **1 = No divergence in CCP process; 2 = Minor divergence in CCP process and 3 = Major divergence in CCP process.** Additional information has been provided under each of the tables where additional clarification is required for the recorded divergence and to identify where CCP content may have been unavailable. Further guidance is provided in the diagram below.

1.1	Live Products	ICE Trust				ICE Clear			LCH	CME	Divergence
		D2D Current	D2D Future	D2C Current	D2C Future	D2D Current	D2D Future	D2C Future	Current/Future	Current/Future	
A	Which products does the service currently support?	NA Indices and Single Names	European Indices and Single Names	European Indices and Single Names	European Indices and Single Names	European Indices	North American Indices	2			
B	What is the methodology to add a new product / index / tenor / currency to the service?	Approved by Trader Advisory Committee (TAC) and Risk Working Group	Approved by Trader Advisory Committee (TAC) and Risk Working Group	Approved by Trader Advisory Committee (TAC) and Risk Working Group	Approved by: Trader Advisory Committee (TAC) and Risk Working Group	Approved by: Trader Advisory Committee (TAC) and Risk Working Group	Approved by: Trader Advisory Committee (TAC) and Risk Working Group	Approved by: Trader Advisory Committee (TAC) and Risk Working Group	Approved by Risk and Member Meeting (RMM)	Approved by CDS Advisory Group and CDS Risk Committee	3
<b>Agreed Module Divergence</b>											3

**Additional Information on Divergences**  
**A** - CME CDX IG Index, Series 12 through 16, 5 year tenor / LCH: European Indices: iTraxx Main, HiVol, XOver; Series 5+; 3, 5, 7, 10 year tenors / ICE Trust - 41 NA Indices & 109 Single Names / ICE Clear - 34 European Indices and 111 Single Names.  
**B** - There are major differences amongst the CCP models. Greater clarity is required on how new names are proposed for both LCH & CME.

**CCP Pending/Missing Feedback**  
**B** - LCH & CME - To provide clarity on their criteria for liquidity to determine if a name should be clearing eligible. For example, if a Risk Committee wanted to propose a new name what specific criteria and procedures would need to be followed and adhered to for that change to occur.

**1) Product Scope & Confirmations [Divergence Rating 2 = Minor Divergence]**

1.1	Live Products	ICE Trust				ICE Clear			LCH		CME	Divergence
		D2D Current	D2D Future	D2C Current	D2C Future	D2D Current	D2D Future	D2C Future	Current	Future	Current/Future	
A	Which products does the service currently support?	NA Indices and Single Names	European Indices and Single Names	European Indices and Single Names	European Indices and Single Names	European Indices (and Single Names incase of Restructuring)	European Indices and Single Names	North American Indices	2			
B	What is the methodology to add a new product / index / tenor / currency to the service?	Approved by Risk Committee and Board	Approved by Risk and Member Meeting (RMM)	Approved by Risk and Member Meeting (RMM)	Approved by CDS Advisory Group and CDS Risk Committee	3						
											Agreed Module Divergence	3

**Additional Information on Divergences**

A - CME CDX IG Index, Series 12 through 16, 5 year tenor / LCH: European Indices: iTraxx Main, HiVol, XOver; Series 5+; 3, 5, 7, 10 year tenors / ICE Trust - 41 NA Indices & 109 Single Names / ICE Clear - 34 European Indices and 111 Single Names.

B - There are major differences amongst the CCP models. Greater clarity is required on how new names are proposed for both LCH & CME.

**CCP Pending/Missing Feedback**

B - LCH & CME - To provide clarity on their criteria for liquidity to determine if a name should be clearing eligible. For example, if a Risk Committee wanted to propose a new name what specific criteria and procedures would need to be followed and adhered to for that change to occur.

1.2	Products Active & Under Development	ICE Trust				ICE Clear			LCH		CME	Divergence
		D2D Current	D2D Future	D2C Current	D2C Future	D2D Current	D2D Future	D2C Future	Current	Future	Current/Future	
A	Which products are currently under development (include proposed launch dates)?	N/A	Single Names - HY & Financial; Non-Western Sovereigns;	N/A	Single Name - NA IG, HY and Financial; Non-Western Sovereigns	N/A	Single Names - HY & Financial; Western Sovereigns;	Single Names - EUR IG, HY & Financial; European Indices; Western Sovereigns;	N/A	Single Names (for IG iTraxx, HiVol & CrossOver constituents)	NA Single Names (for CDX IG & HY); Additional NA Indices (CDX: HY s11 to current & IG s10 to current)	2
	Single Names (IG)	N/A	Completed	N/A	Q4 - 2011	N/A	Completed		N/A	Q1-2012	Q2/Q3 2011	
	Single Names (HY & Financial)	N/A	Q3/Q4-2011	N/A	Q4 - 2011	N/A	Q3/Q4-2011		N/A	Q1-2012	Q3/Q4 2011	
	European Indices	N/A	-	N/A	-	Live	-		N/A	-	-	
	North American Indices	Live	-	Live	Q3-2011	N/A	-		N/A	-	Q2-2011	
	Sovereigns	N/A	Q3/Q4-2011	N/A	Q4-2011	N/A	Q3/Q4-2011		N/A	-	-	
	Tranche	N/A	-	N/A	-	N/A	-		N/A	-	-	
B	How are members notified of new products added to the service?	N/A	Public Circular	N/A	Public Circular	N/A	Public Circular	Public Circular	Email notification & website notice	Email notification & website notice	Email notification & Advisory website notice	1
											Agreed Module Divergence	2

**Additional Information on Divergences**

A - CCPs are going live with different products at varying times, current product coverage varies. LCH will offer Client Clearing Q1 2012.  
 B - No divergence as all CCPs notify members. Slight divergence exists amongst the CCPs models with regard to the specific detail they have provided. However their methodologies are broadly similar; with regard to the fact they all notify CMs, be it via email, circular or alert once a new product has completed testing and is active.

**CCP Pending/Missing Feedback**

A - Clarifications are need from the CCPs on the below;  
 ICE Trust - To clarify for D2D Current & D2C Current why these questions were deemed N/A.  
 ICE Clear - To clarify for D2D Current why these questions were deemed N/A.

1.3	Confirmations	ICE Trust				ICE Clear			LCH		CME	Divergence
		D2D Current	D2D Future	D2C Current	D2C Future	D2D Current	D2D Future	D2C Future	Current	Future	Current/Future	
A	Does DTCC DS Match representation provide legally binding confirmation, if not, where is the legal confirmation stored?	Legal confirmation occurs at CCP upon trade acceptance and contracts also registered in TIW	Legal confirmation occurs at CCP upon trade acceptance and contracts also registered in TIW	Legal confirmation occurs at CCP upon trade acceptance and contracts also registered in TIW	Legal confirmation occurs at CCP upon trade acceptance and contracts also registered in TIW	Legal confirmation occurs at CCP upon trade acceptance and contracts also registered in TIW	Legal confirmation occurs at CCP upon trade acceptance and contracts also registered in TIW	Legal confirmation occurs at CCP upon trade acceptance and contracts also registered in TIW	Original transaction confirmation occurs through DSMatch, legal novation occurs at LCH	Original transaction Confirmation when CCP accepts the Original transaction for clearing and legal novation occurs at LCH	Legal confirmation occurs at CME upon trade acceptance by each counterparty's CMS	1
B	How is trade confirmation and registration within the DTCC Warehouse (TIW) supported (assume support of Gold Records unless otherwise stated)?	Via trusted affirmation sources (e.g. ICE Link). EB & DCM submit own legs	Via ANT submission mechanism (from 18-July)	Via trusted affirmation sources (e.g. ICE Link). EB & DCM submit own legs	ICE will submit ANT messages for the FCM & EB	Via trusted affirmation sources (e.g. ICE Link). EB & DCM submit own legs	ICE will move to ANT messages for all D2D flows (no timescale available)	ICE will move to ANT messages for all D2C flows (no timescale available)	CCP updates DTCC TIW via messages (MQ)	CCP updates DTCC TIW via messages (MQ)	Enhanced Copper records are delivered to DTCC TIW	3
* ANT = Automated New Trade											Agreed Module Divergence	2

**Additional Information on Divergences**

A - There is consistency across the CCP models with all maintaining the legal record in-house. There is a major divergence with regard to the extent the CCPs utilize the DTCC Warehouse (TIW).

B - CME process to deliver Copper Records to the TIW is the main outlier amongst the CCP models

1.4	Fallbacks	ICE Trust				ICE Clear			LCH		CME	Divergence
		D2D Current	D2D Future	D2C Current	D2C Future	D2D Current	D2D Future	D2C Future	Current	Future	Current/Future	
A	What fallbacks are in place for when a trade does not clear prior to the cut-off time?	A trade matched whilst clearing house open including on T +1 will be submitted for clearing. Otherwise booked bilaterally.	Subject to change under Dodd-Frank	The trade can be submitted to the CCP on T+1.	Subject to change under Dodd-Frank	A trade matched whilst clearing house open including on T +1 will be submitted for clearing. Otherwise booked bilaterally.	Subject to change under regulatory requirements.	The trade can be submitted to the CCP on T+1.	Trade is rejected, can be represented the following Open Day	Trade is rejected, can be represented the following Open Day	Trades are pending until 19:45 EST T+1. If claimed settle T+2 / Unclaimed go to CP negotiated fallbacks	2
B	By what time on T+1 is election of a fallback option required?	A trade matched whilst clearing house open including on T +1 will be submitted for clearing. Otherwise booked bilaterally.	Subject to change under Dodd-Frank	EB can elect fallback on T+1 after 18:00 EST	EB can elect fallback on T+1 after 18:00 EST Subject to change under Dodd-Frank	A trade matched whilst clearing house open including on T +1 will be submitted for clearing. Otherwise booked bilaterally.	Subject to change under regulatory requirements.	EB can elect fallback on T+1 after 18:00 GMT	LCH operates T+1 daily batch novation model, as such the fallback option does not apply	Trades uncleared when Clearing House closes will be rejected. Such trades can be represented the following day	20:00 EST on T+1 (Future model will be 19:00 EST on T+1)	2
C	Where a transaction has been partially cleared do fallbacks apply to the portion of the trade uncleared?	N/A	N/A	Fallbacks do apply for partially cleared trades	Fallbacks do apply for partially cleared trades. Subject to change under Dodd-Frank	N/A	N/A	Fallbacks do apply for partially cleared trades	LCH does not envisage enabling partial clearing	LCH does not envisage enabling partial clearing	Fallbacks do apply for partially cleared trades (handled same way as full block uncleared trades)	2
D	Can fallbacks be executed outside of CCP operating hours provided the clearing deadline has passed?	Fallbacks can be executed outside of CCP operating hours	Yes, subject to any changes under Dodd-Frank	Fallbacks can be executed outside of CCP operating hours	Yes, subject to any changes under Dodd-Frank	Fallbacks can be executed outside of CCP operating hours	Fallbacks can be executed outside of CCP operating hours	Fallbacks can be executed outside of CCP operating hours	Fallbacks can be executed outside of CCP operating hours	Fallbacks can be executed outside of CCP operating hours	Fallbacks can be executed outside of CCP operating hours	1
Agreed Module Divergence											3	

**Additional Information on Divergences**

ICE - If any trades are not accepted by 18:30 they are rejected. Trades subsequently processed on T+1 have a trade date of T. CPs have agreed a protocol whereby for CP-CP trade date clearing, a trade matched whilst the Clearing House is closed is submitted to the TIW as a bilateral trade.

2) Collateralization [Divergence Rating 3 = Major Divergence]

2.1	Variation Margin (VM) or equivalent including pricing method and data sources	ICE Trust				ICE Clear			LCH		CME	Divergence
		D2D Current	D2D Future	D2C Current	D2C Future	D2D Current	D2D Future	D2C Future	Current	Future	Current/Future	
A	What mechanism is used to communicate intra day margin calls?	Feedback Pending	Feedback Pending	Feedback Pending	Intra-margin calls are not applicable	The move to T+0 novation will result in intra-day calls. Reports are pushed to eCCW client area and ftp server	Intra-margin calls are not applicable	TBC				
B	How frequently is variation margin calculated?	Intra-day	Intra-day	Intra-day	Intra-day	Intra-day	Intra-day	Intra-day	Daily	Intra-day	Daily (see additional comments below)	3
C	How often and through what process is margin collected?	Daily / Intra-day A SWIFT message is sent to the CMs Account	Daily / Intra-day A SWIFT message is sent to the CMs Account	Daily / Intra-day A SWIFT message is sent to the CMs Account	Daily / Intra-day A SWIFT message is sent to the CMs Account	Daily / Intra-day A SWIFT message is sent to the CMs Account	Daily / Intra-day A SWIFT message is sent to the CMs Account	Daily / Intra-day A SWIFT message is sent to the CMs Account	Once per day cash is collected via TARGET 2	Up to 3 times per day cash will be collected via TARGET 2	At 08:30 EST margin is collected through the banking cycle	2
D	What pricing and data sources are utilized?	CM pricing data points	CM pricing data points	CM pricing data points	Markit same day prices	CM pricing data points	CM pricing data points, secondary sources if necessary	3				
E	How is interest calculated and settled on collateral held/posted?	Initial Margin (IM) and Guarantee Fund (GF): CM receive Fed Funds minus 1 bps Settled monthly  Interest on VM: Calculated daily - daily effective Fed Funds x ACT/360 Accrues daily settles monthly	Initial Margin (IM) and Guarantee Fund (GF): CM receive Fed Funds minus 1 bps Settled monthly  Interest on VM: Calculated daily - daily effective Fed Funds x ACT/360 Accrues daily settles monthly	Initial Margin (IM) and Guarantee Fund (GF): CM receive Fed Funds minus 1 bps Settled monthly  Interest on VM: Calculated daily - daily effective Fed Funds x ACT/360 Accrues daily settles monthly	Initial Margin (IM) and Guarantee Fund (GF): CM receive Fed Funds minus 1 bps Settled monthly  Interest on VM: Calculated daily - daily effective Fed Funds x ACT/360 Accrues daily settles monthly	Initial Margin (IM) and Guarantee Fund (GF): CM receives ICE Deposit Rate Reported daily via an ICE report and settled monthly  Interest on VM: Calculated daily - Daily Eonia flat rate x ACT/360 Accrues daily and settles monthly	Initial Margin (IM) and Guarantee Fund (GF): CM receives ICE Deposit Rate Reported daily via an ICE report and settled monthly  Interest on VM: Calculated daily - Daily Eonia flat rate x ACT/360 Accrues daily and settles monthly	Initial Margin (IM) and Guarantee Fund (GF): CM receives ICE Deposit Rate Reported daily via an ICE report and settled monthly  Interest on VM: Calculated daily - Daily Eonia flat rate x ACT/360 Accrues daily and settles monthly	Interest on IM is calculated daily: EONIA - 25bp on EUR GBP LIBOR - 25bp on GBP USD LIBOR - 25bp on USD  Interest on Default Fund is flat EONIA, GBP LIBOR & USD LIBOR respectively  Interest on VM calculated and exchanged daily: - NPV x Eonia flat x (day count)/360	Interest on IM is calculated daily: EONIA - 25bp on EUR GBP LIBOR - 25bp on GBP USD LIBOR - 25bp on USD  Interest on Default Fund is flat EONIA, GBP LIBOR & USD LIBOR respectively  Interest on VM calculated and exchanged daily: - NPV x Eonia flat x (day count)/360	Initial Margin (IM): CMs may elect to participate in one of CME's Interest Earning Facility (IEF) programs  Interest on VM: For USD products the Fed Funds effective rate at 09:00 EST rate is used and annualized via the Actual/360 convention covering the number of calendar days since the prior clearing processing day	2
											Agreed Module Divergence	3

Additional Information on Divergences

B & C - Currently LCH do not administer intra-day margin calls. Only ICE currently issue intra day margin calls. CME has the capability to calculate and collect both intra-day and end-of-day margins. Currently, CME only collects end-of-day margin, however it runs intra-day calculations for internal purposes. As clearing volume ramps up, CME will re-evaluate whether or not to implement the collection of intra-day margin.

D - LCH use pricing provided by Markit for MTM calculations all other CCPs use a member bids/offers to derive a settlement price which LCH will implement in their target model.

E - LCH and CME settle interest on VM with the daily movement of VM. ICE calculate interest on VM daily but settle monthly.

CCP Pending/Missing Feedback:

A - Divergence marked as "TBC" as not all CCPs advised the method of communication for margin calls (via phone / e-mail / fax).

C - CME to provide further information as to what the "banking cycle" involves.

2.2	Buy side segregation	ICE Trust				ICE Clear			LCH		CME	Divergence
		D2D Current	D2D Future	D2C Current	D2C Future	D2D Current	D2D Future	D2C Future	Current	Future	Current/Future	
A	Is segregation of collateral supported for Clearing Members (CMs) and their clients and what are the requirements?	N/A	N/A	Client Omnibus account fully segregated from a CMs House account	Client Omnibus account fully segregated from a CMs House account. Subject to change under Dodd-Frank.	N/A	N/A	Client collateral is held in a client omnibus account fully segregated from a CMs House account	N/A	LCH will offer an account structure that allows clients to segregate their collateral from other clients collateral. A client omnibus solution will also be proposed that would involve comingling the collateral for all clients managed through the omnibus account	Client positions and collateral are segregated from that of the CM's house (or proprietary) positions and collateral in a sequestered account	1
B	Is buy-side collateral for positions segregated by the CM in separate accounts or comingled with the assets of the CM or other customers collateral?	N/A	N/A	There is one client omnibus account per CM. The client omnibus account comingles customer collateral for that CM. Individual customer positions are registered at the clearing house on an anonymous basis	There is one client omnibus account per CM. The client omnibus account comingles customer collateral for that CM. Individual customer positions are registered at the clearing house on an anonymous basis. Subject to change under Dodd-Frank.	N/A	N/A	There is one client omnibus account per CM. The client omnibus account comingles customer collateral for that CM. Individual customer positions are registered at the clearing house on an anonymous basis	N/A	LCH will offer an account structure that allows clients to segregate their collateral from other clients collateral. A client omnibus solution will also be proposed that would involve comingling the collateral for all clients managed through the omnibus account	Separate accounting and segregation of customer positions and monies. Buy-side collateral is comingled with other customer's collateral but separate from CM collateral	1
C	Provide details of the type of account used for this purpose (omnibus/registered customer account or other)	N/A	N/A	There is one client omnibus account per CM. The client omnibus account comingles customer collateral for that CM. Individual customer positions are registered at the clearing house on an anonymous basis	ICE will hold margin for both indices and Single Names in a CFTC OTC Cleared Account Class (known as the 4(d)(f) account)	N/A	N/A	There is one client omnibus account per CM. The client omnibus account comingles customer collateral for that CM. Individual customer positions are registered at the clearing house on an anonymous basis	N/A	LCH will offer an account structure that allows clients to segregate their collateral from other clients collateral. A client omnibus solution will also be proposed that would involve comingling the collateral for all clients managed through the omnibus account	Margin is held in CFTC COTC Account Class	1
											Agreed Module Divergence	1

**Additional Information on Divergences**

No divergences found

**Pending/Missing Feedback:**

LCH are still defining their D2C offering so were unable to provide detailed information relating to the structure of asset segregation

### 3) Trade Messaging & Connectivity **[Divergence Rating 3 = Major Divergence]**

3.1	List the available platforms and mechanisms for connectivity per vendor for Trade Submission, Clearing Approval, Post Trade Messaging, Backloading, Netting and other functions and Portability.		ICE Trust				ICE Clear			LCH		CME	Divergence
			D2D Current	D2D Future	D2C Current	D2C Future	D2D Current	D2D Future	D2C Future	Current	Future	Current/Future	
A	Trade submission (including manual entry / SEF submission / voice)	CCP to list each individual vendor they are or will be connected to	Connectivity to all IDBs listed below is via ICE Link:	Bloomberg VCON	Bloomberg VCON	Connectivity to all IDBs listed below is via ICE Link:	Bloomberg VCON	No direct connectivity agnostic to upstream platforms. Submission based on LCH flag in SuperID field in DTCC	Connectivity to IDBs through MarkitSERV: GFI, ICAP, Tullet Prebon, Vyapar CM	CME ClearPort	3		
			BGC	BGC	MarketAxess	MarketAxess	BGC			BGC		MarketAxess	Bloomberg VCON
			Creditex	Creditex	MarketSERV	MarketSERV	Creditex			Creditex		MarketSERV	MarkitSERV
			Phoenix Partners	Phoenix Partners	Tradeweb	Tradeweb	Phoenix Partners			Phoenix Partners		Tradeweb	Tradeweb
			Tullet Prebon	Tullet Prebon	ICE Link	ICE Link	Tullet Prebon			Tullet Prebon		ICE Link	CME FEC
			Tradition	Tradition	-	-	Tradition			Tradition		-	MarketAxess
			Vyapar CM	Vyapar CM	-	-	Vyapar CM			Vyapar CM		-	Other IDBs pending
			GFI (Q2)	GFI (Q2)	-	-	GFI (Q2)			GFI (Q2)		-	ICE Link (Q3)
			ICAP (Q2)	ICAP (Q2)	-	-	ICAP (Q2)			ICAP (Q2)		-	-
			ICE Link	ICE Link	-	-	ICE Link			ICE Link		-	-
B	Clearing approval	CCP to list each individual Affirmation provider they are or will be connected to	BGC	Bloomberg VCON	Bloomberg VCON	BGC	Bloomberg VCON	No direct connectivity. Agnostic to affirmation platforms under current model (source trades directly from TIW)	Connectivity to IDBs through MarkitSERV: GFI, ICAP, Tullet Prebon, Vyapar CM	CME ClearPort	3		
			Creditex	ICE Link	ICE Link	Creditex	Creditex			ICE Link		Bloomberg VCON	
			Phoenix Partners	Phoenix Partners	MarketAxess	MarketAxess	Phoenix Partners			Phoenix Partners		MarketAxess	MarkitSERV
			Tullet Prebon	Tullet Prebon	MarketSERV	MarketSERV	Tullet Prebon			Tullet Prebon		MarketSERV	Tradeweb
			Tradition	Tradition	Tradeweb	Tradeweb	Tradition			Tradition		Tradeweb	CME FEC
			Vyapar CM	Vyapar CM	-	-	Vyapar CM			Vyapar CM		-	MarketAxess
			GFI (Q2)	GFI (Q2)	-	-	GFI (Q2)			GFI (Q2)		-	Other IDBs pending
			ICAP (Q2)	ICAP (Q2)	-	-	ICAP (Q2)			ICAP (Q2)		-	ICE Link (Q3)
			ICE Link	ICE Link	-	-	ICE Link			ICE Link		-	-
			C	Post trade messaging	CCP to list each Valuation / Reporting provider they are or will be connected to	Feedback Pending	Feedback Pending			Feedback Pending		Feedback Pending	Feedback Pending
D	Backloading	CCP to list backloading providers	ICE Link & DTCC	ICE Link & DTCC	ICE Link	ICE Link	ICE Link & DTCC	ICE Link & DTCC	ICE Link	DTCC	DTCC	CME Migration Utility	3
E	Netting	CCP to list netting platforms	ICE Trust Weekly	ICE Trust Daily	ICE Link	ICE Link	ICE Clear Weekly	ICE Clear Daily	ICE Link	LCH compression on demand	LCH compression on demand	CME Position Management Module	3
F	Portability - Please advise the workflow and messaging expected in relation to:	Portability between DCMs or FCMs	N/A	N/A	ICE Link	ICE Link	N/A	N/A	ICE Link	Portability not available until D2C offering supported	Portability not available until D2C offering supported	CME Front End Clearing (FEC)	3
G	Portability - Please advise the workflow and messaging expected in relation to:	Fund to fund transfer portability	N/A	N/A	ICE Link	ICE Link	N/A	N/A	ICE Link	Portability not available until D2C offering supported	Portability not available until D2C offering supported	CME Front End Clearing (FEC)	3
<b>Agreed Module Divergence</b>											<b>3</b>		

**Additional Information on Divergences**

A & B - Connectivity for Trade Submission and Clearing Approval varied between direct connectivity or indirect connectivity via Middleware platforms.  
 C - It was not possible to accurately analyze this module due to the varying levels of information provided.

**CCP Pending/Missing Feedback**

See "Feedback Pending" cells above.

3.2	Is a full STP electronic processing solution available on the following: Trade Submission, Clearing Approval, Post Trade Messaging, Backloading, Netting and other functions and Portability? If no STP what alternate mechanisms are available?	ICE Trust				ICE Clear			LCH		CME	Divergence	
		D2D Current	D2D Future	D2C Current	D2C Future	D2D Current	D2D Future	D2C Future	Current	Future	Current/Future		
A	Trade submission (including manual entry / SEF submission / voice)	BGC	Yes	Yes	N/A	N/A	Yes	Yes	N/A	No	No	Launch Pending	3
		Creditex	Yes	Yes	N/A	N/A	Yes	Yes	N/A	No	No	Launch Pending	
		Phoenix Partners	Yes	Yes	N/A	N/A	Yes	Yes	N/A	No	No	Launch Pending	
		Tullet Prebon	Yes	Yes	N/A	N/A	Yes	Yes	N/A	No	Yes	-	
		GFI (Q2)	Yes	Yes	N/A	N/A	Yes	Yes	N/A	No	Yes	Launch Pending	
		ICAP (Q2)	Yes	Yes	N/A	N/A	Yes	Yes	N/A	No	Yes	-	
		Tradition	Yes	Yes	N/A	N/A	Yes	Yes	N/A	No	No	Launch Pending	
		Vyapar CM	Yes	Yes	N/A	N/A	Yes	Yes	N/A	No	Yes	Launch Pending	
		ICE Link	Agnostic API	Agnostic API	Agnostic API	Agnostic API	Agnostic API	Agnostic API	Agnostic API	No	No	Planned Q3	
		Bloomberg VCON	N/A	N/A	Yes	Yes	N/A	N/A	Yes	No	No	Yes- via API	
		MarketAxess	N/A	N/A	Yes	Yes	N/A	N/A	Yes	No	No	Launch Pending	
		MarkitSERV	N/A	N/A	Yes	Yes	N/A	N/A	Yes	No	Agnostic API	Yes- via API	
		Tradeweb	N/A	N/A	Yes	Yes	N/A	N/A	Yes	No	No	Yes- via API	
		CME ClearPort	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	No	Yes- via API	
		CME FEC	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	No	Yes- via API	
DTCC	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No - csv and MQ	Yes	N/A			
B	Clearing approval	BGC	Feedback Pending	Feedback Pending	N/A	N/A	Feedback Pending	Feedback Pending	N/A	LCH send reports post novation to CMs. These reports can be integrated into dealer systems but not currently a full STP solution.	N/A	Launch Pending	3
		Creditex	Feedback Pending	Feedback Pending	N/A	N/A	Feedback Pending	Feedback Pending	N/A		N/A	Launch Pending	
		Phoenix Partners	Feedback Pending	Feedback Pending	N/A	N/A	Feedback Pending	Feedback Pending	N/A		N/A	Launch Pending	
		Tullet Prebon	Feedback Pending	Feedback Pending	N/A	N/A	Feedback Pending	Feedback Pending	N/A		Feedback Pending	-	
		GFI	Feedback Pending	Feedback Pending	N/A	N/A	Feedback Pending	Feedback Pending	N/A		Feedback Pending	Launch Pending	
		ICAP	Feedback Pending	Feedback Pending	N/A	N/A	Feedback Pending	Feedback Pending	N/A		Feedback Pending	-	
		Tradition	Feedback Pending	Feedback Pending	N/A	N/A	Feedback Pending	Feedback Pending	N/A		N/A	Launch Pending	
		Vyapar CM	Feedback Pending	Feedback Pending	N/A	N/A	Feedback Pending	Feedback Pending	N/A		Feedback Pending	Launch Pending	
		ICE Link	Yes	Yes	Yes	Yes	Yes	Yes	Yes		N/A	Planned Q3	
		Bloomberg VCON	N/A	N/A	Yes	Yes	N/A	N/A	Yes		N/A	Yes- via API	
		MarketAxess	N/A	N/A	Yes	Yes	N/A	N/A	Yes		N/A	Launch Pending	
		MarkitSERV	N/A	N/A	Yes	Yes	N/A	N/A	Yes		Yes	Yes- via API	
		Tradeweb	N/A	N/A	Yes	Yes	N/A	N/A	Yes		N/A	Yes- via API	
		CME ClearPort	N/A	N/A	N/A	N/A	N/A	N/A	N/A		N/A	Yes- via API	
		CME FEC	N/A	N/A	N/A	N/A	N/A	N/A	N/A		N/A	Yes- via API	
DTCC	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Yes	N/A				
C	Post trade messaging	CCP to list each Valuation / Reporting provider that has STP	Feedback Pending	Feedback Pending	Feedback Pending	Feedback Pending	Feedback Pending	Feedback Pending	Feedback Pending	DTCC (inc. MQ messages) & LCH reports - not STP	DTCC (inc. MQ messages) & LCH reports - not STP	CME's Trade Processing Module	3
D	Backloading	CCP to advise backloading providers with STP	ICE Link	ICE Link	ICE Link	ICE Link	ICE Link	ICE Link	ICE Link	DTCC TIW	DTCC TIW	CME Migration Utility	3
E	Netting	CCP to advise netting platforms with STP	ICE Trust with STP via ICE Link	ICE Trust with STP via ICE Link	ICE Link	ICE Link	ICE Clear with STP via ICE Link	ICE Clear with STP via ICE Link	ICE Link	LCH upon request. Not currently STP but planned in future release	STP - file exchange with LCH system	CME Position Management Module	3
F	Portability	STP solutions for Portability between DCMs or FCMS	N/A	N/A	Feedback Pending	Feedback Pending	N/A	N/A	Feedback Pending	Portability not available until D2C offering supported	Will be supported when D2C launched	Upon request from client to CM using CME Front End Clearing (FEC)	3
G	Portability	STP solutions for fund to fund transfer portability	N/A	N/A	Feedback Pending	Feedback Pending	N/A	N/A	Feedback Pending	Portability not available until D2C offering supported	Will be supported when D2C launched	Upon request from client to CM using CME Front End Clearing (FEC)	3
											<b>Agreed Module Divergence</b>	<b>3</b>	

**Additional Information on Divergences**

It was not possible for the work stream to accurately analyze this module due to the varying levels of information provided for the Clearing Approval, Post Trade Messaging & Portability.

**CCP Pending/Missing Feedback**

See "Feedback Pending" cells above.

3.3	What contingency plans exist for failures in the STP process for; Trade Submission, Clearing Approval, Post Trade Messaging, Backloading, Netting and other functions and Portability?	ICE Trust				ICE Clear			LCH		CME	Divergence	
		D2D Current	D2D Future	D2C Current	D2C Future	D2D Current	D2D Future	D2C Future	Current	Future	Current/Future		
A	Trade submission (including manual entry / SEF submission / voice)	BGC	Feedback Pending	Feedback Pending	N/A	N/A	Feedback Pending	Feedback Pending	N/A	DTCC ensures within its BCP availability of STP within 2 hrs. This would enable processing of DTCC data overnight	Feedback Pending	Under CME's BCP there are 3 backup data centre's these will utilized for both upstream and downstream platforms. These are mirrored in real time between redundant data centers. Each IDB and SEF will be directed to specific backup systems, IP address and API. For CME's FEC system recovery is immediate	3
		Creditex	Feedback Pending	Feedback Pending	N/A	N/A	Feedback Pending	Feedback Pending	N/A				
		Phoenix Partners	Feedback Pending	Feedback Pending	N/A	N/A	Feedback Pending	Feedback Pending	N/A				
		Tullet Prebon	Feedback Pending	Feedback Pending	N/A	N/A	Feedback Pending	Feedback Pending	N/A				
		GFI (Q2)	Feedback Pending	Feedback Pending	N/A	N/A	Feedback Pending	Feedback Pending	N/A				
		ICAP (Q2)	Feedback Pending	Feedback Pending	N/A	N/A	Feedback Pending	Feedback Pending	N/A				
		Tradition	Feedback Pending	Feedback Pending	N/A	N/A	Feedback Pending	Feedback Pending	N/A				
		Vyapar CM	Feedback Pending	Feedback Pending	N/A	N/A	Feedback Pending	Feedback Pending	N/A				
		ICE Link	N/A	N/A	Via ICE Link GUI	Via ICE Link GUI	N/A	N/A	Via ICE Link GUI				
		Bloomberg VCON	N/A	N/A	Via ICE Link GUI	Via ICE Link GUI	N/A	N/A	Via ICE Link GUI				
		MarketAxess	N/A	N/A	Via ICE Link GUI	Via ICE Link GUI	N/A	N/A	Via ICE Link GUI				
		MarkitSERV	N/A	N/A	Via ICE Link GUI	Via ICE Link GUI	N/A	N/A	Via ICE Link GUI				
		Tradeweb	N/A	N/A	Via ICE Link GUI	Via ICE Link GUI	N/A	N/A	Via ICE Link GUI				
		CME ClearPort	N/A	N/A	N/A	N/A	N/A	N/A	N/A				
CME FEC	N/A	N/A	N/A	N/A	N/A	N/A	N/A						
DTCC	N/A	N/A	N/A	N/A	N/A	N/A	N/A						
B	Clearing approval	BGC	Affirmation via GUI	Affirmation via GUI	N/A	N/A	Affirmation via GUI	Affirmation via GUI	N/A	The 2 hour BCP with DTCC will allow update of the TIW post novation to be completed in a timely manner	Feedback Pending	Under CME's BCP there are 3 backup data centers these will utilized for both upstream and downstream platforms. These are mirrored in real time between redundant data centers. Each IDB and SEF will be directed to specific backup systems, IP address and API. For CME's FEC system recovery is immediate	2
		Creditex	Affirmation via GUI	Affirmation via GUI	N/A	N/A	Affirmation via GUI	Affirmation via GUI	N/A				
		Phoenix Partners	Affirmation via GUI	Affirmation via GUI	N/A	N/A	Affirmation via GUI	Affirmation via GUI	N/A				
		Tullet Prebon	Affirmation via GUI	Affirmation via GUI	N/A	N/A	Affirmation via GUI	Affirmation via GUI	N/A				
		GFI (Q2)	Affirmation via GUI	Affirmation via GUI	N/A	N/A	Affirmation via GUI	Affirmation via GUI	N/A				
		ICAP (Q2)	Affirmation via GUI	Affirmation via GUI	N/A	N/A	Affirmation via GUI	Affirmation via GUI	N/A				
		Tradition	Affirmation via GUI	Affirmation via GUI	N/A	N/A	Affirmation via GUI	Affirmation via GUI	N/A				
		Vyapar CM	Affirmation via GUI	Affirmation via GUI	N/A	N/A	Affirmation via GUI	Affirmation via GUI	N/A				
		Bloomberg VCON	N/A	N/A	ICE Link GUI	ICE Link GUI	N/A	N/A	ICE Link GUI				
		ICE Link	N/A	N/A	ICE Link GUI	ICE Link GUI	N/A	N/A	ICE Link GUI				
		MarketAxess	N/A	N/A	ICE Link GUI	ICE Link GUI	N/A	N/A	ICE Link GUI				
		MarkitSERV	N/A	N/A	ICE Link GUI	ICE Link GUI	N/A	N/A	ICE Link GUI				
		Tradeweb	N/A	N/A	ICE Link GUI	ICE Link GUI	N/A	N/A	ICE Link GUI				
		CME ClearPort	N/A	N/A	N/A	N/A	N/A	N/A	N/A				
CME FEC	N/A	N/A	N/A	N/A	N/A	N/A	N/A						
DTCC	N/A	N/A	N/A	N/A	N/A	N/A	N/A						
C	Post trade messaging	Feedback Pending	Feedback Pending	Feedback Pending	Feedback Pending	Feedback Pending	Feedback Pending	Feedback Pending	2hr BCP with DTCC overnight processing	Feedback Pending	CME BCP (see above)	3	
D	Backloading	Feedback Pending	Feedback Pending	Feedback Pending	Feedback Pending	Feedback Pending	Feedback Pending	Feedback Pending	2hr BCP with DTCC overnight processing	Feedback Pending	CME BCP (see above)	3	
E	Netting	Feedback Pending	Feedback Pending	Feedback Pending	Feedback Pending	Feedback Pending	Feedback Pending	Feedback Pending	2hr BCP with DTCC overnight processing	Feedback Pending	CME BCP (see above)	3	
F	Portability	Portability between DCMs or FCMs	N/A	N/A	Feedback Pending	Feedback Pending	N/A	N/A	Feedback Pending	N/A	Feedback Pending	CME BCP (see above)	3
G	Portability	Fund to fund transfer portability	N/A	N/A	Feedback Pending	Feedback Pending	N/A	N/A	Feedback Pending	N/A	Feedback Pending	CME BCP (see above)	3
<b>Agreed Module Divergence</b>											<b>3</b>		

**Additional Information on Divergences**

It was not possible for the work stream to accurately analyze this module due to the varying levels of information provided for the Trade Submission, Clearing Approval, Post Trade Messaging, Backloading, Netting, & Portability.

**CCP Pending/Missing Feedback**

See "Feedback Pending" cells above.

3.4	Do you envisage any differences to any of the above questions for Dealer to Dealer versus Client Clearing models and (ii) Is there any expectations to alter any of the above workflows in future, to your knowledge?	ICE Trust				ICE Clear			LCH		CME	Divergence
		D2D Current	D2D Future	D2C Current	D2C Future	D2D Current	D2D Future	D2C Future	Current	Future	Current/Future	
A	Do you envisage any differences to any of the above questions for Dealer to Dealer versus Client Clearing models and (ii) Is there any expectations to alter any of the above workflows in future, to your knowledge?	Feedback Pending	No major differences expected. Portability functionality will be added with D2C model. Compression to be automated in future release	No major differences expected. Portability functionality will be added with D2C model. Compression to be automated in future release	No changes and no difference between D2D and D2C	3						
											Agreed Module Divergence	3

**Additional Information on Divergences**

It was not possible for the work stream to accurately analyze this module due to the varying levels of information provided.

**CCP Pending/Missing Feedback**

No changes were noted by any of the CCPs that responded to this module. Not all have responded so an effective comparison at this point cannot be made.

4) Business Hours & Timing [Divergence Rating 2 = Minor Divergence]

4.1	Business Hours	ICE Trust				ICE Clear			LCH		CME	Divergence
		D2D Current	D2D Future	D2C Current	D2C Future	D2D Current	D2D Future	D2C Future	Current	Future	Current/Future	
A	What are the platforms current business/operating hours?	08:00 - 18:00 EST	Intention to support 24-hr clearing	08:00 - 18:00 EST	Intention to support 24-hr clearing	08:00 - 18:00 GMT	Intention to support 24 hour clearing	Intention to support 24 hour clearing	08:00 - 19:00 CET	Opening hours extendable depending on client demand	19:00 Sunday to 20:00 Friday EST	2
B	Is 24 hour support available for queuing trades post CCP close?	No, post 18:30 EST no trades will be pending	Yes, but only once ICE move to support 24hr Operating model	No, post 18:30 EST no trades will be pending	Yes, but only once ICE move to support 24hr Operating model	No, post 18:30 GMT no trades will be pending	Yes, but only once ICE move to support 24hr Operating model	Yes, but only once ICE move to support 24hr Operating model	N/A as all trades are backloaded directly from DTCC TIW	Depends on workflow managed with matching platform. No trades will be queued by LCH	24 hours Sunday - Friday	2
C	Is a unique message type allocated to trades submitted for clearing after CCP business hours?	No	No	No	No	No	No	No	N/A	Depends on matching platform	No	1
D	Are reports available on a nightly basis as to what trades have been queued up after closing hours?	Not from CCP, reports available from affirmation platforms post 18:00 EST	Not from CCP currently (available once ICE move to 24hr Clearing)	Not from CCP, reports available from affirmation platforms post 18:00 EST	Not from CCP, reports available from affirmation platforms post 18:00 EST	Not from CCP, reports available from affirmation platforms post 18:00 GMT	Not from CCP currently (available once ICE move to 24hr Clearing)	Not from CCP, reports available from affirmation platforms post 18:00 GMT	No, LCH does not track trades after CCP business Hours	Not from LCH as LCH does not track trades after CCP business Hours. Matching platform may provide this kind of report	No reports, but CMs may view a list of real-time queued trades via Front End Clearing (FEC)	1
E	Is a clear protocol in place for correcting trades that are pending clearing post CCP close?	Yes. Cancel & rebook protocol in place	Yes. Cancel & rebook protocol in place	Yes. Cancel & rebook protocol in place	Yes. Cancel & rebook protocol in place	Yes. Cancel & rebook protocol in place	Yes. Cancel & rebook protocol in place	Yes. Cancel & rebook protocol in place	No	No	Yes withdraw workflow to correct and resubmit pending trades	3
F	Can trades be queued and remain in pending status until 17:00 local time the next business day?	A trade matched whilst clearing house open including on T +1 will be submitted for clearing. Otherwise booked bilaterally.	Subject to change under Dodd-Frank	Yes, per existing fallback rules (subject to change under Dodd-Frank)	Yes, per existing fallback rules (subject to change under Dodd-Frank)	A trade matched whilst clearing house open including on T +1 will be submitted for clearing. Otherwise booked bilaterally.	Subject to change under regulatory requirements	Yes, per existing fallback rules	No, will reject trades not accepted on CCP close	Yes, Trades can remain pending during opening hours, and will only be rejected if not accepted on CCP close	Yes affirmed trades submitted before 19:45 EST can remain pending until 20:00 the next day	1
											Agreed Module Divergence	2

Additional Information on Divergences

A - At least 1hr earlier close for both ICE Trust & ICE Clear.

C - No CCP currently generates unique messages or provides reports on queued trades submitted after CCP closing hours. Although no divergence exists on either of these points, if either unique messages or reporting should be required both would need to be implemented across all offerings considered.

D - ICE Trust & ICE Clear currently do not track trades affirmed post 18:00. LCH does not track trades after CCP Business Hours. CME provides a real-time list of queued trades via Front End Clearing ("FEC") but no standalone reporting.

E - CME allows for trades that are pending to be amended. ICE rely on cancel & rebook process. Although most CCPs have a clear protocol in place levels of automation vary across CCPs.

**5) End of Day Valuation Process [Divergence Rating 2 = Minor Divergence]**

5.1	Pricing & Product Reference Data sources	ICE Trust				ICE Clear			LCH		CME	Divergence
		D2D Current	D2D Future	D2C Current	D2C Future	D2D Current	D2D Future	D2C Future	Current	Future	Current/Future	
A	What product reference data sources are utilized?	MarkitRED	MarkitRED	MarkitRED	MarkitRED	MarkitRED	MarkitRED	MarkitRED	MarkitRED	MarkitRED	MarkitRED	1
											Agreed Module Divergence	1

**Additional Information on Divergences**

No divergences found

5.2	Pricing Process	ICE Trust				ICE Clear			LCH		CME	Divergence
		D2D Current	D2D Future	D2C Current	D2C Future	D2D Current	D2D Future	D2C Future	Current	Future	Current/Future	
A	Where are settlement prices published and who are they made available to?	ICE website and Markit	SPAN file published on client web portal and client FTP server	SPAN file published on client web portal and client FTP server	CME Website and publication via FTP	2						
B	At what time does the clearing platform distribute prices?	17:30 EST	17:30 EST	17:30 EST	17:30 EST	17:30 GMT	17:30 GMT	17:30 GMT	21:00 CET	21:00 CET	17:00 EST	2
C	Are Clearing Members (CMs) required to submit prices?	Yes	No	Yes	Yes	3						
D	What is the process and timeframe for submitting prices?	Report generated and CMs to submit price to the CCP by 16:30-16:35 EST	Report generated and CMs to submit price to the CCP by 16:30-16:35 EST	Report generated and CMs to submit price to the CCP by 16:30-16:35 EST	Report generated and CMs to submit price to the CCP by 16:30-16:35 EST	Report generated and CMs to submit price to the CCP by 16:30-16:35 GMT	Report generated and CMs to submit price to the CCP by 16:30-16:35 GMT	Report generated and CMs to submit price to the CCP by 16:30-16:35 GMT	N/A	Report generated and CMs to submit price to the CCP by 16:30-16:35 GMT	Report generated and CMs to submit price to the CCP by 16:30-16:35 EST	3
E	What information is provided to Clearing Members (CM) in order to reconcile MTM positions?	Daily Reports (position)	Daily Reports (trade by trade & position)	Daily Reports (trade by trade & position)	Daily Reports (trade by trade & position)	2						
											Agreed Module Divergence	2

**Additional Information on Divergences**

- B - Geographical time differences. LCH is later in the day than other CCPs.
- C - ICE Clear, ICE Trust and CME require members to submit prices, LCH does not currently require submission, however their future model will.
- E - ICE Clear and ICE Trust use position level for their MTM CM reports and LCH and CME use trade by trade and position level.

**Additional Background Questions**

CME, LCH & ICE to advise in the case of only one or two dealers how the price would be constructed for a non liquid underlying.

6) Lifecycle Event Processing [Divergence Rating 3 = Major Divergence]

6.1	Trade netting approach and effect on novations	ICE Trust				ICE Clear			LCH		CME	Divergence
		D2D Current	D2D Future	D2C Current	D2C Future	D2D Current	D2D Future	D2C Future	Current	Future	Current/Future	
A	Please describe the representation of a trade vs. positions within a CCP?	Trade	Trade/Position	Trade	Trade/Position	Trade	Trade/Position	Trade/Position	Trade/Position	Trade/Position	Trade/Position	2
B	What type of netting approach is applied?	Cyclical	Cyclical	Adhoc	Cyclical	Cyclical	Cyclical	Cyclical	Adhoc	Systematic & Adhoc	Cyclical	2
C	Is automatic netting available?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	1
D	How frequently does netting occur?	Weekly	Daily/Weekly	Adhoc available weekly	Daily/Weekly	Weekly	Daily/Weekly	Daily/Weekly	Adhoc available daily	Systematic on frequency defined by CM	Daily	3
<b>Agreed Module Divergence</b>											2	

6.2	Trade servicing, such as Post Trade Events (PTE's) support (Credit Events, Succession Events, Renames, Book changes)*	ICE Trust				ICE Clear			LCH		CME	Divergence
		D2D Current	D2D Future	D2C Current	D2C Future	D2D Current	D2D Future	D2C Future	Current	Future	Current/Future	
A	How are Post Trade Events (PTE) handled? Are they automated via the platform or processed within the TIW?	DTCC TIW	DTCC TIW	CME	2							
B	Are bilateral amendments possible?	No	No	Feedback Pending	1							
C	State explicitly any PTE's which are not currently supported and whether there are any plans to implement them at a later date.	Amendments supported through cancel and rebook.	Amendments supported through cancel and rebook	Work arounds in place for events unavailable on current platforms; Unwinds, Amendments, Novations	Work arounds in place for events unavailable on current platforms; Unwinds, Amendments, Novations	Work arounds in place for events unavailable on current platforms; Unwinds, Amendments, Novations	1					
D	Do participants have the option to de-clear a trade? If so list the different scenarios where this would be considered permissible?	No, however there is support for a misclear workflow - see below	No, however there is support for a misclear workflow - see below	No, however there is support for a misclear workflow - see below	No, however there is support for a misclear workflow - see below	No, however there is support for a misclear workflow - see below	No, however there is support for a misclear workflow - see below	No, however there is support for a misclear workflow - see below	No, Dealers should agree a back-to-back trade and then clear the reverse trade and finally net with trade to be de-cleared	No, Dealers should agree a back-to-back trade and then clear the reverse trade and finally net with trade to be de-cleared	No	1
E	Are any pre-conditions necessary to be in place to allow participants to de-clear transactions?	N/A	N/A	N/A	N/A							
F	How are book changes reflected?	Desk ID Transfer Form	Dealers can amend the DeskID in DTCC TIW which will automatically update LCH systems	Dealers can amend the DeskID in DTCC TIW which will automatically update LCH systems	Front End Clearing (FEC) transfer	2						
<b>Agreed Module Divergence</b>											2	

\* Credit Event, Succession Events and renames are covered in detail in 6.5 & 6.6

Additional Information on Divergences

A - CME uses their own platform for PTEs. All other CCPs use DTCC TIW.  
 D - Workarounds for de-clearing:  
 ICE Trust & ICE Clear: can initiate a De-clearing/Mis-clear via the affirmation platform. This creates an equally offsetting trade and flattens the position at the CCP.  
 LCH: Dealers should agree a back-to-back trade and then clear the reverse trade and finally net with trade to be de-cleared.  
 CME - If both parties agree the trade should be de-cleared, then they both submit the equal and offsetting trade for clearing.

CCP Pending/Missing Feedback

F - ICE Clear to advise if, their Desk ID transfer form amends the Desk ID in the DTCC TIW?

6.3	Settlement Infrastructure	ICE Trust				ICE Clear			LCH		CME	Divergence
		D2D Current	D2D Future	D2C Current	D2C Future	D2D Current	D2D Future	D2C Future	Current	Future	Current/Future	
A	How are coupons, fees and final cash settlements processed (central settlement process or other)?	Continuous Linked Settlement (CLS)	ICE Trust Payment Structure	Continuous Linked Settlement (CLS)	ICE Trust Payment Structure	Continuous Linked Settlement (CLS)	ICE Clear Payment Structure	ICE Clear Payment Structure	Continuous Linked Settlement (CLS)	Target2 subject to wider market discussion	Direct settlement with CME approved Settlement Banks	3
B	Please provide the relevant timeframes for the settlement of cash flows.	Daily: 09:00 EST for margin requirements	Daily 08:30 -09:00 CET	Daily 08:30 -09:00 CET	Daily 08:30 EST	2						
C	Do you support the netting of cash flows and margin requirements? If so please describe the process?	No	Yes	No	Yes	No	Yes	Yes	No	Yes (if all cash flows move to Target2)	Yes	2
D	Please advise whether clearing is performed T+1 vs. T+3 for the relevant Clearing models.	T+3	T+1	T+3	T+1	T+3	TBD	TBD	T+3	T+3/T+1 subject to wider market discussion	T+1	3
											<b>Agreed Module Divergence</b>	<b>3</b>

**Additional Information on Divergences**

**B** - Time differences due to geographical locations. Slight variation on timings, but within 1hr of each other.  
 - For ICE Trust and ICE Clear Current – The product cash flows for ICE (coupons, fees etc.) are not settled as part of the margin call. Both clearing houses utilize CLS for product cash flows and settle margin directly with CPs. ICE Trust Future (as of July 18th) - Product cash flows for ICE (coupons, fees etc.) are settled as part of the margin call and will be netted as ICE Trust is internalizing all money movements. ICE Clear Future will do the same but timing to be determined.

**C** - CME net cash flows and margin. For ICE Clear, ICE Trust and LCH cash flow and margin are treated separately. For future ICE Clear, ICE Trust and LCH (if assumedly they moved to Target2) cash flows and margins will be netted.

**D** - CME follows a NY business day calendar for processing USD denominated contracts for settlements versus the NY/London calendar applied in the bilateral market. In either market, whether upfront is settled on T+1 or T+3, the actual settlement can occur on a day other than T+1 or T+3 as a result of a holiday. The business day that CME variation margin settles, which includes the upfront, is T+1 provided that T+1 is a NY Business Day. If T+1 is not a NY business day, then the next available NY business day would apply. In the CME model, mark-to-market and upfront are netted together as a single settlement variation.

6.4	Backloading & Compression	ICE Trust				ICE Clear			LCH		CME	Divergence
		D2D Current	D2D Future	D2C Current	D2C Future	D2D Current	D2D Future	D2C Future	Current	Future	Current/Future	
A	Please describe the process for backloading including frequency and preconditions to a backloading request: i. Process	CM upload	CM upload	Client initiate via affirmation platform (ICE Link)	CM upload	CM upload	CM upload	Client initiate via affirmation platform (ICE Link)	Bilaterally in DTCC	Bilaterally in DTCC	Bilaterally in CME migration utility tool	2
	ii. Frequency	Weekly	Daily	Daily	Daily							
	iii. Preconditions	Trade has to be Certain in the Warehouse and be eligible for Clearing	Trade has to be Certain in the Warehouse and be eligible for Clearing	Trade has to be Certain in the Warehouse and be eligible for Clearing	Trade has to be Certain in the Warehouse and be eligible for Clearing	Trade has to be Certain in the Warehouse and be eligible for Clearing	Trade has to be Certain in the Warehouse and be eligible for Clearing	Trade has to be Certain in the Warehouse and be eligible for Clearing	Trade has to be Certain in the Warehouse and be eligible for Clearing	Trade has to be Certain in the Warehouse and be eligible for Clearing	Trade has to be Certain in the Warehouse and be eligible for Clearing	
B	Please provide any information provided to members with regards to reconciliations, completeness and accuracy tests.	Clearing instruction files are generated	General Reports available for Reconciliation	General Reports available for Reconciliation	General Reports available for Reconciliation	3						
C	Is Dealer-Dealer (D2D) backloading segregated from Client (D2C) backloading?	Yes	N/A	Feedback Pending	Feedback Pending	2						
D	Is compression of Dealer-Dealer (D2D) and Client (D2C) trades segregated?	Yes	N/A	Yes	Feedback Pending	2						
E	What processing timeframes are in place around backloading cycles (from allege to processing)?	5 days	1 day	1 day	1 day (CME offers the ability to run backloading daily)	3						
F	Are terminations and the new trades created facing the CH linked for audit purposes?	Yes, weekly audit instruction. The notional of the terminated trades equals the notional of the new trades	Yes, weekly audit instruction. The notional of the terminated trades equals the notional of the new trades	Yes, weekly audit instruction. The notional of the terminated trades equals the notional of the new trades	Yes, weekly audit instruction. The notional of the terminated trades equals the notional of the new trades	Yes, weekly audit instruction. The notional of the terminated trades equals the notional of the new trades	Yes, weekly audit instruction. The notional of the terminated trades equals the notional of the new trades	Yes, weekly audit instruction. The notional of the terminated trades equals the notional of the new trades	Yes- Audit available	Yes- Audit available	Yes- Audit available	2
G	What facilities are in place to monitor the affected bulk positions?	Clearing House and ICE Link web interface /reports	Clearing House and ICE Link web interface /reports	Clearing House and ICE Link web interface /reports	Clearing House and ICE Link web interface /reports	Clearing House and ICE Link web interface /reports	Clearing House and ICE Link web interface /reports	Clearing House and ICE Link web interface /reports	ECCW platform & client FTP service	ECCW platform & client FTP service	CME Migration Utility	3
H	Are trades consumed via an API or batch file or other process? If other, please provide details.	Both API and batch	Both API and batch	Both API and batch	API / and also provide an exit file to upload to DTCC	1						
I	Where a Succession Event is pending ISDA DC determination or yet to be processed within the TIW under what name would the trade be back loaded into the CH (Old/New name)?	Pre or not yet DC decided use Old Name	Pre or not yet DC decided use Old Name	Pre or not yet DC decided use Old Name	Pre or not yet DC decided use Old Name	Pre or not yet DC decided use Old Name	Pre or not yet DC decided use Old Name	Pre or not yet DC decided use Old Name	Pre or not yet DC decided use Old Name	Pre or not yet DC decided use Old Name	Pre or not yet DC decided use Old Name	1
											Agreed Module Divergence	3

**Additional Information on Divergences**

- A - Frequency for backloading for ICE Trust and ICE Clear is weekly and for LCH and CME is daily. Preconditions for backloading across the CCPs are consistent, but processing arrangements vary across CCPs.
- B - ICE Clear and ICE Trust have dedicated reports and instruction files for reconciliations. CME and LCH use reports already produced for other CCP processes for reconciliation.
- E - ICE Trust and ICE Clear use a 5 day cycle for backloading and CME and LCH have a 1 day process.
- F - Audit on terminations and new trades is available across all the CCPs however their processes differ.
- G - Each CCP uses their own platform to monitor bulk affected positions. They all use different platforms resulting in a major divergence.

6.5	Credit Events approach	ICE Trust	ICE Clear	LCH	CME	Divergence
A	Do you subscribe to or support the triggering and management of Strategic Restructuring Credit Events?	N/A	Yes	Yes	N/A	3
B	To what extent do you use industry infrastructure to support this process?	N/A	DTCC TIW	DTCC TIW	N/A	3
C	In the event of no DC Determination do you have a process where you or dealers can bilaterally or unilaterally trigger a Credit Event or Succession Event?	Yes	Yes	No, with expectation that DC rule change will be sufficient to remove necessity of backup DC	Yes	3
D	Are both default Cash Settlement and Physical delivery supported via the auction process?	Yes	Yes	Yes	Yes	1
E	Is the process in place ISDA Protocol compliant?	ISDA	ISDA	ISDA	ISDA	1
F	Can Old Restructuring Events currently be supported for both Clearing Members (CMs) and non-Clearing Members?	N/A	Yes for CMs	No	N/A	3
<b>Agreed Module Divergence</b>						<b>3</b>

**Additional Information on Divergences**

- A - ICE Trust and CME do not support Restructuring as they do not clear trades with Restructuring (as such they are marked N/A).
- A - ICE Trust plan to clear trades with Old Restructuring in the future.
- B - LCH and ICE Clear use the DTCC TIW platform for triggering Restructuring events, CME and ICE Trust do not clear trades with Restructuring.
- C - It is currently being discussed within the CSC forum if the DC should always rule on cleared names. It should also be noted that although the divergence has been marked as 1, LCH do not currently have in place the ability to determine an event if the DC does not make a ruling.
- Additionally CCP internal processes may not always ensure a uniformed outcome across CCPs on individual events.
- F - The industry as a whole is looking for a Client Clearing solution for Restructuring. No solution currently exists.

6.6	Corporate Actions - Succession Events and Renames	ICE Trust	ICE Clear	LCH	CME	Divergence
A	Are the ISDA Determination Committees the recognized authority for determining both Successor Events and Credit Events?	Yes	Yes	Yes	Yes	1
B	Are Successor Events and Rename processing fully supported?	Yes	Yes	Yes	Yes	1
C	In what platform are these events processed?	DTCC TIW	DTCC TIW	DTCC TIW	CME	2
<b>Agreed Module Divergence</b>						<b>2</b>

**Additional Information on Divergences**

- C - ICE Trust, ICE Clear and LCH use DTCC TIW. CME uses there own platform.
- General** - Timings in relation to the processing of Succession Events by each CCP are not always consistent.

7) Reporting [Divergence Rating 1 = No Divergence]

7.1	Reporting	ICE Trust				ICE Clear			LCH		CME	Divergence
		D2D Current	D2D Future	D2C Current	D2C Future	D2D Current	D2D Future	D2C Future	Current	Future	Current/Future	
A	Please provide details of the reports you currently provide to Clearing Members & clients and the associated data dictionary along with the distribution mechanism and frequency of the reports?	Daily reports available: - Initial Margin (IM), Variance Margin (VM) & Guaranty Fund (GF) - Transaction and position reports for reconciliation - Client level reports for positions and transactions  Reports are accessible via web reports and CSV files	Daily reports available: - Initial Margin (IM), Variation Margin (VM) & Guaranty Fund (GF) - Transaction and position reports for reconciliation - Client level reports for positions and transactions  Reports are accessible via web reports and CSV files	Daily reports available: - Initial Margin (IM), Variance Margin (VM) - Transaction and position reports for reconciliation - Client level reports for positions and transactions  Reports are accessible via web reports and CSV files	Daily reports available: - Initial Margin (IM), Variation Margin (VM) - Transaction and position reports for reconciliation - Client level reports for positions and transactions  Reports are accessible via web reports and CSV files	Daily reports available: - Initial Margin (IM), Variance Margin (VM) & Guaranty Fund (GF) - Transaction and position reports for reconciliation - Client level reports for positions and transactions  Reports are accessible via web reports and CSV files	Daily reports available: - Initial Margin (IM), Variance Margin (VM) & Guaranty Fund (GF) - Transaction and position reports for reconciliation - Client level reports for positions and transactions  Reports are accessible via web reports and CSV files	Daily reports available: - Initial Margin (IM), Variation Margin (VM) - Transaction and position reports for reconciliation - Client level reports for positions and transactions  Reports are accessible via web reports and CSV files	Daily reports available: - Initial Margin (IM), Variance Margin (VM) - Transaction and position reports for reconciliation - Client level reports for positions and transactions  Reports are accessible via web reports and CSV files	Daily reports available: - Public files (market data) - Private files (dealer trades) - Treasury flows, margin requirements; Credit and Succession Events)  Some reports published multiple times during the day	Daily reports available: - Trade management, - Clearing, and settlement. Reports are accessible via: CME's Document Direct application	1
B	Do Participants (CPs) have the options to customize the reporting?	Yes, Requests are submitted to Operations Working Group and if agreed, are incorporated for all CPs	Yes, Requests are submitted to Operations Working Group and if agreed, are incorporated for all CPs	Yes, Requests are submitted to Operations Working Group and if agreed, are incorporated for all CPs	Yes, Requests are submitted to Operations Working Group and if agreed, are incorporated for all CPs	Yes, Requests are submitted to Operations Working Group and if agreed, are incorporated for all CPs	Yes, Requests are submitted to Operations Working Group and if agreed, are incorporated for all CPs	Yes, Requests are submitted to Operations Working Group and if agreed, are incorporated for all CPs	Yes, Requests are submitted to Operational User Group and if agreed, are incorporated for all CPs.	Yes, Requests are submitted to Operational User Group and if agreed, are incorporated for all CPs.	No, CME reports are standardized. Reports are available via XML feeds; which can be integrated into CPs reporting systems	1
<b>Agreed Module Divergence</b>											1	

**Additional Information on Divergences**

No divergences found.

**CCP Pending/Missing Feedback**

B - CCPs were asked to clarify whether they offer daily margin reports daily position reports; daily cash flow reports and Credit and Succession Event reports for both D2D trades; D2C trades at both trade and position level.