On a recent ISDA call, DTCC provided the following update regarding the CiCi utility which is relevant for ISDA D-F August Protocol questionnaire submission in addition to Part 43 and 45 reporting. Please contact Nathan Hahn (nhahn@dtcc.com) at DTCC with any questions.

• The CICI Utility portal (www.ciciutility.org) is always available if a CICI is needed immediately.
• DTCC implemented bulk file registration in October specifically to respond to the needs of Fund Managers and others.
• The bulk file process involves submitting a formatted file to DTCC. This often takes several iterations between the Fund Managerss and DTCC so it may take several days/weeks to produce an accepted file.
• Once a file is accepted by DTCC, the file can usually be de-duplicated and CICIs issued within a matter of days.
• **Fund managers should note that bulk files requiring CICIs by year-end should be submitted no later than December 10th**.
• Given the ISDA Protocol deadline of December 31st, DTCC has increased staff to manage and process bulk files received.
• DTCC indicated that it will prioritize bulk files received from Fund Managers related to the ISDA Protocol over files submitted only for CFTC reporting purposes which is not required until April 10th in most cases.

NOTE FROM ISDA: Please note the compliance date for the ISDA August DF Protocol covered rules is January 1, 2013. Questionnaires should be submitted to permissioned swap dealers well in advance of this date.