

MEMORANDUM

To: File No. S7-03-15

From: Yvonne Fraticelli

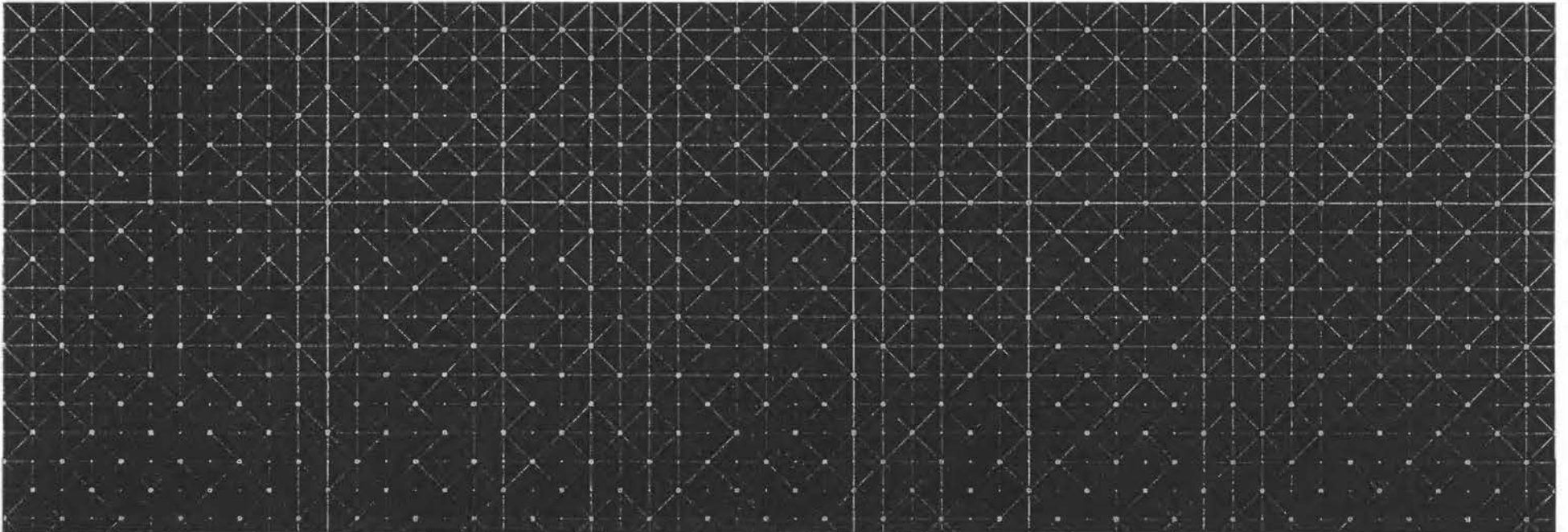
Subject: Summary of meeting with representatives from the Depository Trust and Clearing Corporation ("DTCC")

Date: June 18, 2015

On June 17, 2015, representatives from the Securities and Exchange Commission's Division of Trading and Markets (Sarah Albertson, Jesse Cappelle, Elizabeth Fitzgerald, Michael Gaw, Kathleen Gross, Jeff Mooney, Stephanie Park, Geoff Pemble, Christian Sabella, Andrew Shanbrom, and Yvonne Fraticelli) and Office of Compliance, Inspections, and Examinations (Gerry Massie, Ann Moles, Lisa Rivers, Will Schoenfeld, and Paula Sherman) met with Marisol Collazo, Debra Cook, Kate Delp, Stan Preston, and Lisa Siebold of DTCC. Among the topics discussed were the proposed amendments to Regulation SBSR (File No. S7-03-15) and security-based swap data repository registration. Copies of the materials provided at the meeting are attached.

DTCC

DTCC Overview



DTCC Services

DTCC offers two services to support derivatives products that are further described below.

- **TIW Service**

- TIW is a voluntary ancillary service that supports Credit Derivatives transactions post-trade processing for any trades that have been electronically confirmed via MarkitSERV.
- TIW performs lifecycle event processing that facilitates payments via CLS Bank and ensures the record is kept up-to-date. This includes payment calculations, netting, credit event processing, and restructuring events.
- As a voluntary service, TIW provides regulators access to such data under ODRF guidelines for this credit derivatives population.
- TIW passes data to GTR service (further explained below)

- **GTR Service**

- DTCC offers its participants the GTR service which is provided for the purposes of supporting regulatory reporting as prescribed by regulations. The legal entity that supports regulatory reporting in North America, is DTCC Data Repository (U.S.) LLC (“DDR”)
- DDR is currently regulated by CFTC and Canada (Ontario, Manitoba and Quebec) for all asset classes covered under the respective regulations.

TIW and GTR

- **TIW Interactions with GTR**
 - MarkitSERV, an electronic confirmation provider (matching), for credit derivatives provides TIW and GTR confirmation data
 - TIW provides GTR with lifecycle event data as a result of any updates performed by TIW for event processing.
 - DTCC contemplates (and consistent with CFTC approach) that TIW records may be used for initial loading of historical data (backloading) to start an opening position. This is a one-time event to seed the DDR database.
- **Other GTR Functions (independent of TIW)**
 - Participants (e.g. firms or SEFs) will also need to establish connectivity to GTR service to submit real-time price data for public dissemination.
 - Participants may choose to establish direct connectivity or use third party providers who offer connectivity to the GTR service.
 - DDR provides regulators with data consistent with prescribed regulations under its license. In addition, GTR also provides its onboarded participants with reports to view the data they have submitted into the GTR service.