

August 16, 2017

**Submitted via:** <https://www.sec.gov/rules/other.shtml>

Eduardo A. Aleman  
Assistant Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-1090

Re: Request for Comment Period Extension | (i) ICE Trade Vault, LLC; Notice of Filing of Amended Application for Registration as a Security-Based Swap Data Repository and (ii) DTCC Data Repository (U.S.) LLC; Notice of Filing of Amended Application for Registration as a Security-Based Swap Data Repository

**Release No. 34-81223; File No. SBSDR-2017-01 and Release No. 34-81302; File No. SBSDR-2016-02**

Dear Mr. Aleman:

The International Swaps and Derivatives Association, Inc. (“ISDA”)<sup>1</sup> appreciates the opportunity to provide comments to the Securities and Exchange Commission (“Commission”) on behalf of its members which may have obligations under *Regulation SBSR - Reporting and Dissemination of Security-Based Swap Information; Final Rule* (“SBSR”) with respect to ICE Trade Vault, LLC’s (“ICE TV”) amended application for registration as a security-based swap data repository (“SBSDR”) and DTCC Data Repository (U.S.), LLC’s Notice of Filing of Amended Application for Registration as a Security-Based Swap Data Repository (“DTCC”).

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<sup>1</sup> Since 1985, ISDA has worked to make the global derivatives markets safer and more efficient. Today, ISDA has more than 875 member institutions from 68 countries. These members comprise a broad range of derivatives market participants, including corporations, investment managers, government and supranational entities, insurance companies, energy and commodities firms, and international and regional banks. In addition to market participants, members also include key components of the derivatives market infrastructure, such as exchanges, clearing houses and repositories, as well as law firms, accounting firms and other service providers. Information about ISDA and its activities is available on the Association's web site: [www.isda.org](http://www.isda.org).



The Commission published ICE TV's amended application for public comment through August 22, 2017, and DTCC's through August 30, 2017. For the reasons outlined below, ISDA respectfully requests that the Commission (a) coincide the comment deadline dates and (b) extend the comment periods.

ISDA believes that the various SBSDR requirements should be harmonized in order to increase efficiencies and mitigate costs for counterparties that are required to onboard to more than one SBSDR and to comply with their obligations under SBSR. An extension and harmonization of response due dates will allow sufficient time for the consideration of both amended applications and to identify any inconsistencies or conflicts.

ISDA is in the process of drafting responses to the Commission's request for comments regarding specific aspects of both the ICE TV and DTCC's amended applications. We would welcome the extension to allow industry participants to provide more robust and coordinated feedback.

For the reasons stated above, ISDA respectfully requests that the Commission extend the comment deadline for both amended applications until September 15, 2017.

ISDA greatly appreciates the Commission's consideration of this request and would be happy to discuss any questions or concerns at your earliest convenience.

Thank you.

A handwritten signature in black ink, appearing to read "E Hsu", written over a horizontal line.

Eleanor Hsu  
Director, Data & Reporting