

February 26, 2021

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

Secretary Vanessa A. Countryman
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

**Re: Request for Comment Period Extension - DTCC Data Repository (U.S.), LLC;
Notice of Filing for Registration as a Security-Based Swap Data Repository (Release
No. 34-91071; File No. SBSDR-2020-01)**

Dear Secretary Countryman,

The International Swaps and Derivatives Association, Inc. (“ISDA”)¹ 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 DTCC Data Repository (U.S.), LLC’s (“DDR”) Notice of Filing of Application for Registration as a Security-Based Swap Data Repository (“SBSDR”).

DDR’s application was published in the Federal Register on February 10, 2021, with a public comment period ending on March 3, 2021. ICE Trade Vault, LLC (“ICE TV”) is expected to also submit its application shortly. For the reasons outlined below, ISDA respectfully requests that the Commission extend the DDR comment period to coincide with the expected comment deadline date of ICE TV’s application.

¹ Since 1985, ISDA has worked to make the global derivatives markets safer and more efficient. Today, ISDA has over 925 member institutions from 75 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, intermediaries, 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 website: www.isda.org.



Both DDR and ICE TV filed applications in 2016 for registration as SBSDRs, and amended applications in 2017. 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. ISDA is in the process of drafting a response to the Commission's request for comments regarding specific aspects of DDR's application. However, an extension and harmonization of SBSDR application response due dates will enable industry participants to provide coordinated, more robust feedback, and allow time to consider both applications simultaneously to identify any inconsistencies or challenges.

For the reasons stated above, ISDA respectfully requests that the Commission extend the DDR application comment deadline to coincide with the deadline of the anticipated SBSDR application from ICE Trade Vault, LLC.

ISDA appreciates the Commission's consideration of this request. Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "E Hsu", written in a cursive style.

Eleanor Hsu
Director, Data and Reporting
International Swaps and Derivatives Association, Inc. (ISDA)

cc: Carol McGee, Head, Office of Derivatives Policy, Division of Trading and Markets
Justin Pica, Senior Policy Advisor, Division of Trading and Markets
Michael Gaw, Assistant Director, Division of Trading and Markets