

Exhibit DD

43. Attach as Exhibit DD policies and procedures relating to the applicant's calculation of Positions.

The calculation of gross and net notional amounts of open security-based swap transactions ("positions" as defined in Rule 240.13n-5(a)) to meet the SEC requirements for data collection and maintenance is dependent on the addition of further information to determine scope and attributes. Currently, DDR's procedures for calculating "Trade State" status of a specific security-based swap is to provide transaction data required to be reported in the DDR Harmonized Field Set (see Exhibit GG1). Trade State is simply the trade with the latest submitted values and represents the current "state" of the trade.

In order to provide a position other than the current trade state of a security-based swap, DDR's procedure is that a written query be submitted to DDR identifying the attributes to be aggregated and other information including:

- a) whether a position is being requested for all open security-based swaps in the system or for all open security-based swaps by person;
- b) which of the one or more attributes should be aggregated into the position;
- c) whether there are other attributes required to be included (which must be among those reported);
- d) what transaction data constitutes the "long risk" or the "short risk" of the underlying instrument, index, or reference entity, if those attributes are to be included;
- e) whether the position being requested is to be provided on a daily, weekly, monthly or other basis;
- f) the format for the output of the request;
- g) a defined method of delivery for the position information; and
- h) any other information necessary for DDR to process the request.

In addition, the ability to calculate these positions is automated and can be performed by the requestor at the SEC by directly querying the database through the Global Portal.