

December 22, 2020

Via Electronic Submission to formsdrfilings@sec.gov

Matthew Lee
Assistant Director, TM Office of Clearance and Settlement
U.S. Securities and Exchange Commission
100 F Street NE
Washington, DC 20549

RE: DTCC Data Repository (U.S.) LLC Application to be Registered as a Securities-Based Swap Data Repository

Dear Matt,

DTCC Data Repository (U.S.) LLC (“DDR”), a wholly owned subsidiary of The Depository Trust and Clearing Corporation (“DTCC”), hereby submits an application for registration as a Security-Based Swap Data Repository (“SBSDR”) under the Securities Exchange Act of 1934.

This application is being submitted consistent with the no action relief provisions set out in the adopting release “Cross-Border Application of Certain Security-Based Swap Requirements” (“Cross-Border Release”).¹ Where DDR is relying on the provisions in this Cross-Border Release, there is no description in the application. For example, the Cross-Border Release sets out the Commission’s position that for four years following the reporting compliance date (or such earlier date if the Commission so determines), SBSDRs are not required to adhere to any security information processor provisions of Section 11A(b) of the Exchange Act.² No information, therefore, is included in this application related to the duties of a securities information processor in any of the application exhibits.

DDR represents that it is provisionally registered with the Commodity Futures Exchange Commission (“CFTC”) as a swap data repository (“SDR”) and is in compliance with applicable requirements under the CFTC reporting rules applicable to a registered SDR. DDR intends to rely on the Commission’s position

¹ Cross-Border Application of Certain Security-Based Swap Requirements, Exchange Act Release No. 87780 (December 18, 2019), 85 FR 6270 (Feb. 4, 2020).

² Id. at 6348.

outlined in the Cross-Border Release for applicable reporting rules and SBSDR duties for the period set forth.

Should you have any questions on this application, please do not hesitate to contact me at 212-855-4760 or Kdelp@dtcc.com (please cc DDR's Chief Compliance Officer on any correspondence: Mark Bramante at mbramante@dtcc.com).

Sincerely,

Katherine Delp
General Manager
DTCC Data Repository (U.S.) LLC

Cc: Mark Bramante
DDR Chief Compliance Officer
Debra W. Cook
DTCC Managing Director and Deputy General Counsel