

TO: OTC Clearing Members, Back Office Managers

FROM: CME Clearing

ADVISORY #: 22-364

DATE: 9/22/2022

SUBJECT: OTC Clearing Member Static Data Updates

To facilitate complete and accurate swap data reporting by CME Clearing pursuant to the Commodity Futures Trading Commission's ("CFTC") Part 45 regulations, OTC Clearing Members are required to provide CME Clearing with certain information, as described below, no later than October 31, 2022.

All Firms

1. Federal Entity Identifier

Each OTC Clearing Member must notify CME Clearing whether itself or any customer or affiliate for which it clears is a "Federal Entity" as defined by applicable CFTC Technical Specifications. By default, CME Clearing will not categorize an entity as a Federal Entity until otherwise notified by the guaranteeing OTC Clearing Member.

2. Entity Classification

Each OTC Clearing Member is required to indicate to CME Clearing whether itself or any firm for which it clears is a Swap Dealer, Major Swap Participant, Financial Entity or Non-Financial Entity in accordance with applicable definitions under CFTC regulations and the Commodity Exchange Act. To facilitate this process, CME Clearing will provide each OTC Clearing Member with its preliminary assessment of proposed classifications for the entities cleared by that OTC Clearing Member. This information is being provided to assist Clearing Members with their required review. It does not relieve an OTC Clearing Member of its obligation to provide complete and accurate information as requested by CME Clearing. OTC Clearing Members are required to confirm or correct entity classification information, as appropriate, and return up-to-date data to CME Clearing not later than October 31, 2022.

Select Firms

1. Account Identifiers (LEI/NPID/PLID)

Where CME Clearing believes that Legal Entity Identifiers ("LEI") for certain OTC Clearing Members' customers or affiliates require confirmation or clarification, CME Clearing will provide each relevant OTC Clearing Member a list that identifies the entities for which confirmation or clarification is required. OTC Clearing Members are required to notify CME Clearing of the relevant entity identifier, including Natural Persons Identifiers ("NPID") or Privacy Law Identifiers ("PLID") where available, for each such entity not later than October 31, 2022.

Mechanism of Data Collection

CME Clearing will contact each OTC Clearing Member and set out the information that will be required from them. All information must be reported in the form and format specified by CME Clearing. CME Clearing may also contact certain clients of the OTC Clearing Member, where practical and appropriate, for additional information. Notwithstanding any direct outreach to clients by CME Clearing, the OTC Clearing Member remains responsible for ensuring the accuracy and completeness of all data for the affiliates and customers that it clears by the deadline.

Timeframe

All responses and required information must be provided to CME Clearing not later than October 31, 2022, in order to facilitate CME Clearing updating its databases with the current information prior to December 5, 2022.

OTC Clearing Members also have a continuing responsibility to ensure that submitted data remain complete and up to date.

Questions or concerns regarding this advisory should be directed to RepositorySupport@cmegroup.com.