

13-050 REVISED

TO: Customers of CME Clearing  
FROM: CME Clearing  
SUBJECT: Swap Participant Reporting Requirements  
DATE: February 8, 2013

**Customers of CME Clearing:**

To comply with applicable CFTC recordkeeping obligations, each swap trade submitted for clearing is required to include appropriate legal entity identifiers that identify the swap counterparties to the trade. The CFTC has designated the “CFTC Interim Compliant Identifier” or “CICI” available at <http://www.ciciutility.org> as the current required identifier system for swap transactions. **This requirement does not apply to futures, including block futures, transactions. In addition, this requirement does not at this time apply to non-US persons.**

There are two ways for market participants to address this requirement to include a legal entity identifier on swaps submitted for clearing at CME Clearing US.

- (1) Trade-by-trade submission: CME’s ClearPort API supports the submission of the LEI/CICI which may be supplied to CME on a cleared swap trade-by-trade basis. For assistance on properly populating this field, please contact CME Client Services (contact details below).
- (2) Registration of CICIs: A market participant may contact the CME OTC Registration Team (contact details below) to register its CICI with CME Clearing. This value will be automatically included in every subsequent and past trade submitted for clearing by that particular market participant.

**Compliance Dates for LEI/CICI Submission:**

Registered Swap Dealers:	December 31, 2012*
Registered Major Swap Participants:	February 14, 2013
Non-Swap Dealers/Non-MSPs:	March 27, 2013

**Questions:**

Market participants with questions regarding this notice can contact either:

CME OTC Registration Team  
1.212.299.2670  
US Toll Free – 1.800.438.8616  
London Toll Free – 0800.898013  
[OTCRegistration@cmegroup.com](mailto:OTCRegistration@cmegroup.com)

CME Client Services Team  
1.312.338.7112  
[onboarding@cmegroup.com](mailto:onboarding@cmegroup.com)

**\* Registered swap dealers that have not already provided a legal entity identifier/CICI to CME Clearing must do so by February 14, 2013.**