

14 - 127

DATE: ~~March 27, 2014~~ Updated: July 23, 2014  
TO: Clearing Member Firms  
FROM: CME Clearing  
SUBJECT: **Updated: Additional Client Master Data for Margin Accounts**

**This advisory updates and replaces Clearing Advisory 14-087, originally published on March 3, 2014.**

**UPDATE #1: July 23, 2014**

**Some clearing firms have indicated that they may not be able to meet the October 6 deadline for submission of the additional client master data. If so, please contact [MarginAccts@cmegroup.com](mailto:MarginAccts@cmegroup.com) to request an extension.**

**Note that work now being done for Ownership & Control Reporting (OCR) may be leveraged to support this requirement. Applications that are used for OCR may be enhanced to support this reporting, and the files may be transmitted to CME directly from such applications exactly as they may be transmitted by any other vendor to CME member firms.**

**There are minor changes to the structure of the FIXML Margin Accounts Master file described below, implemented at the request of the FIX standards committee.**

**For futures accounts, although firms may elect to include the data either in the CGM transmission or the separate Margin Accounts Master file, we recommend the use of the Margin Accounts Master file. Similarly, for swaps accounts, we recommend the use of the Margin Accounts Master file, rather than inclusion of the additional data in the LSOC CVR files.**

CME Clearing is requiring firms to begin providing daily reports of certain additional client information at the margin account level. "Margin account" means the level at which a client's multiple trading accounts are aggregated for margining.

The additional data, which like all client data is held in strict confidence, will be used for risk management purposes both in the normal course of business and to assist with default management. The information will help with the porting of client portfolios in the event of a clearing firm default. The submission of the data on a daily basis will ensure that CME Clearing has the most current information from the clearing firm. Note that the additional data requested does not include SSN's or other sensitive information, only basic client contact data.

Data should be provided for individual margin accounts for both futures and swaps – at the level of margin accounts as represented in Customer Gross Margining (CGM) datafiles and in LSOC Collateral Value Report (CVR) datafiles. To make the submission as easy as possible for clearing firms, we are providing a choice of file formats:

- For margin accounts for futures, firms may elect to provide this additional client contact data either by adding it to their existing Customer Gross Margining (CGM) datafile submissions or by submitting a separate Margin Accounts Master datafile. The Margin Accounts Master datafile is formatted in industry-standard FIXML and contains **only** the client master and client contact data.
- For margin accounts for swaps, firms may elect to provide this additional client contact data either by adding it to existing LSOC Collateral Value Report (CVR) datafile submissions or by submitting a separate Margin Accounts Master datafile.

The timing of the daily reports is not mandated, but firms must submit this data for each account at least once per business day. Firms may begin submitting this data on April 1, 2014, and daily transmissions must begin by Monday, October 6, 2014. For more information please contact CME Clearing at 312-207-2525.

**If you are electing to submit additional client data for margin accounts in the Customer Gross Margining datafiles or the LSOC Collateral Value Report datafiles:**

In the CGM files, currently the following data is required:

- The client account ID
- The origin code
- The client account name
- The account type – hedge, spec, member or omnibus
- The parent account, for a subaccount of an omnibus account

In the LSOC CVR files, currently the following data is required:

- The client account ID
- The origin code
- The client account name
- The guarantee fund or product group

In you are electing to report via either of these files, the following additional data elements will be required:

- The “office code” or “department code” -- the commonly-used value in firm bookkeeping systems for grouping blocks of client accounts – if this concept is used in your firm bookkeeping system
- The country of origin – the code for the country in which the client account is legally domiciled
- The name, phone number, email address and mailing address for the contact person for the client
- The CFTC Large Trader Reportable Account number, if defined
- The Legal Entity Identifier (LEI), if defined

This data is provided in CGM or LSOC datafiles using additional standard FIXML party elements. Below please find an annotated example of the party data for an LSOC CVR report:

```
<Pty ID="CME" R="21"/> // clearing organization
<Pty ID="111" R="4"/> // clearing member firm ID
<Pty ID="CME" R="22"/> // firm exchange
<Pty ID="111" R="1"/> // trade mgmt firm ID
<Pty ID="ABC12345" R="24"> // client account ID
  <Sub ID="1" Typ="26"/> // customer origin
  <Sub ID="ACCTNAME" Typ="5"/> // account name
  <Sub ID="H" Typ="41"/> // customer account type
  <Sub ID="IRS" Typ="44"/> // guarantee fund (product group)
  <Sub ID="AB" Typ="24"/> // office code
  <Sub ID="USA" Typ="31"/> // country of origin
  <Sub ID="JANE SMITH" Typ="9"/> // client contact person
  <Sub ID="312-123-4567" Typ="7"/> // client telephone number
  <Sub ID="jane@smith.com" Typ="8"/> // client email
  <Sub ID="Two Shady Lane, Chicago IL 60606" Typ="6"/> // client address
</Pty>
<Pty ID="1234567890" R="52"/> // CFTC Reportable Number
<Pty ID="ABCDEFXABC" R="7" Src="N"/> // US LEI of the client
```

Note that party role 7 denotes the trading entity, and the source of N identifies the value provided as a Legal Entity Identifier.

Note that for an LSOC CVR, the account type is optional. And for a CGM submission, the guarantee fund is typically not required in order to uniquely identify the client account.

**If you are electing to use the separate Margin Accounts Master datafile:**

Naming convention: **CME.MarginAccounts.nn.Firmxxx.xml**

Where **nn** is **01, 02**, etc., if firms wish to separate data for different business lines in separate files, and **xxx** is the clearing firm ID.

The file is in industry-standard FIXML and uses a **Party Detail** record for each margin account, as follows:

```
<FIXML>
<PtyDetlListRpt
  RptID="LSOC Account Master"
  BizDt="..."
  TxnTm="...">
<PtyDetl ID="ABC12345" R="24"> // client account ID
  <Sub ID="1" Typ="26"/> // customer origin
  <Sub ID="ACCTNAME" Typ="5"/> // account name
  <Sub ID="H" Typ="41"/> // customer account type
  <Sub ID="IRS" Typ="44"/> // guarantee fund (product group)
  <Sub ID="AB" Typ="24"/> // office code
  <Sub ID="USA" Typ="31"/> // country of origin
  <Sub ID="JANE SMITH" Typ="9"/> // client contact person
  <Sub ID="312-123-4567" Typ="7"/> // client telephone number
  <Sub ID="jane@smith.com" Typ="8"/> // client email
  <Sub ID="Two Shady Lane, Chicago IL 60606" Typ="6"/> // client address
  <ReltdPtyDetl ID="CME" R="21"/> // clearing organization
  <ReltdPtyDetl ID="111" R="4"/> // clearing member firm ID
  <ReltdPtyDetl ID="CME" R="22"/> // firm exchange
  <ReltdPtyDetl ID="111" R="1"/> // trade mgmt firm ID
  <ReltdPtyDetl ID="1234567890" R="52"/> // CFTC Reportable Number
  <ReltdPtyDetl ID="ABCDEFXABC" R="7" Src="N"/> // US LEI of the client
</PtyDetl>
<PtyDetl ...> // next client account
</PtyDetl>
...
</PtyDetlListRpt>
</FIXML>
```