

Market Surveillance

DATE: November 4, 2014

NOTICE #: MSN11-04-14

SUBJECT: OCR Reporting for CME, CBT, NYMEX, and COMEX

On November 18, 2013, the Commodity Futures Trading Commission (“CFTC”) published its final ownership and control rules (“[OCR](#)”). CME Group will begin requiring submission of Form 102 information in the same format as will be required by the CFTC, and in line with the CFTC [effective dates](#). This notice is being issued to provide member firms and market participants with OCR testing information and guidance.

As a reminder, the CFTC granted [No-Action Relief](#) on July 23, 2014. Based on the No-Action relief, the effective dates will be as follows:

- Electronic filing of New Form 102A and 102S were extended to February 11, 2015;
- Electronic filing of New Form 102B was extended to March 11, 2015; and
- Electronic filing of New Form 40 and New Form 71 were extended to February 11, 2016.

Please be advised that CME, CBT, NYMEX, and COMEX (“the Exchanges”) are currently accepting and processing test files for OCR submission and providing feedback identifying potential errors. Feedback will be verbally communicated by Exchange staff. Currently, firms are able to provide test files, however fields are not validated, and therefore, feedback messaging is not yet available. They are simply accepted and staged. In December 2014, firms will be able to obtain electronic messaging through the Firm Regulatory Portal (“FRP”) identifying if files were successfully accepted or validations errors were reported.

Test files should be named as follows, submitted via FTP, and placed in the same location as the daily Large Trader Position File: OCR_XCME_XXX_YYMMDD_HHMMSS_Test.xml, where XXX is the CFTC_ID

Market Regulation is also enhancing its FRP to provide member firms with additional reports to assist firms with OCR submissions and reconciliations. A beta-“Unreported Accounts” report is currently available and allows firms to identify accounts where a Form 102A or Form 102B is required by the exchange. Firms wishing to view the information must request access from the contact listed below. Additional information on enhancements, such as a manual entry screen, will be forthcoming and placed on the homepage of the FRP, <https://ftr.cmegroup.com/firmregulatoryportal/logon.jsp>

Please note the following:

- Market Regulation is aware of differences between the CFTC and the Exchanges’ large trader reportable levels and recognizes that in some cases these levels are lower than CFTC thresholds; therefore a Form 102A may be required by Market Regulation earlier than the CFTC would require.
- For products where the Exchanges’ large trader reportable levels are higher than the CFTC levels, over-reporting of accounts to the Exchanges will be accepted.
- The Exchanges’ intend to implement Form 102A and Form 102B on the same dates as the CFTC, and will provide a portal for manual entry in addition to taking the automated XML feeds.
- At this time, CME will not require Form 102S reporting for trading in cleared swaps that are subject to CFTC Part 20 reporting. However, some of these swaps are subject to large trader position reporting and therefore a Form 102A or Form 102B may be required.
- Market Regulation will require clearing member firms and omnibus accounts to submit Form 102A and all related accounts as well as Form 102B accounts.

Questions regarding this notification may be directed to Sandra Valtierra, Manager at 312.347.4137, or sandra.valtierra@cmegroup.com

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