Part 16 Swaps Daily Price and Volume Activity - Interim Standard

Technical Specifications

October 21, 2016 Version 1.3



CFTC

Division of Market Oversight Office of Data and Technology Office of the Chief Economist

Change Log

Change	Version #	Change Description
Date		
5/16/2014	1.0	First Draft version to Reporting markets (30-day window for feedback
05/12/16	1.1	Final Version 1.1
07/27/16	1.2	Updates/proposed changes to version 1.1; Added instructions
10/21/16	1.3	Added Validations and FAQ in appendix
08/23/18	1.3	Updated URL for CFTC account creation

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General Requirements

Under the delegation of authority granted in section 16.07 of the Commission's regulations, the Director of the Division of Market Oversight of the Commodity Futures Trading Commission ("CFTC" or "Commission"), has approved the following format, coding structure, and electronic data submission procedures with respect to the provision by swap execution facilities ("SEFs") and designated contract markets ("DCMs") of price and volume data for swaps or classes of swaps (including options on swaps or classes of options on swaps) for each trading session to the Commission pursuant to Part 16 of the Commission's regulations.

Pursuant to Section 16.01 of the Commission's regulations, the reporting specification set forth in this document is limited to reporting markets (as defined in part 15) that list swaps for trading. The specification provided in this document is an approved interim standard and will be updated and/or modified, as necessary and appropriate, on an ongoing basis. The interim standard is subject to modification due to changes including, but not limited to, types of products traded on reporting markets or the evolution of data schema and reporting formatting.

The interim file format is a pipe (|) delimited text file. An example is provided below. Please note that fields for which no values are provided (e.g., null values) should be represented by an empty pipe delimiter; do not skip a pipe delimiter in cases where no value is provided in a given field. Feedback or suggestions should be provided via email to Part16TechSupport@cftc.gov with a subject line that begins with 'Part16 Reporting:'

Reporting markets should only report swaps that are subject to the jurisdiction of the CFTC. Reporting markets should also ensure that the sum total of the transactions reported matches information published on their respective websites.

The reporting standard contained herein, and Technical Specifications below, address Part 16 of the Commission's regulations only and do not represent or suggest a designation of the unique product identifier and product classification system pursuant to CFTC regulation 45.7. The requirements and the technical specifications contained in this document are not intended to be relied upon by reporting markets for purposes of swap data reporting requirements contained in parts 43 or 45 of the Commission's regulations.

Instructions

All provided notional amounts and trade count should be one-sided and not double counted. If two parties transact on a reporting market, then the notional is reported one time and not double counted to represent the notional of the buy and the sell side of the transaction. Certain fields below (27 - 32) require the notional to be reported in USD. Reporting markets should use an exchange rate consistent with current market conditions to convert traded currencies to USD.

Totals for notional and trade count, as well as price information, should be determined with respect to a number of variables that define the product along with other classifying variables. The SEF must provide information for each unique combination of the following list of variables:

- SEF/DCM ID & Dates (field numbers 1 4)
- SEF/DCM Internal Product ID & Description (field numbers 5 6)
- Swap Product (field numbers 7 − 16)
- Derivatives Clearing Organization (field numbers 17 − 18)
- Premium_Volatility_Other_Flag (field number 19)
- Traded_Currency (field number 24)

Given the large number of variables listed above, the number of reported rows might change significantly from day to day depending on the mixture of products traded. For example, if all fields are the same except for the "Block_Flag" (field number 15), then there will be two reported rows. If instead the reporting market has 10 traded products and each product has block and option content across two traded currencies and all block/option/currency combinations are reported to three different DCOs, then the reporting market will need to submit 240 rows. From this information, the reporting market will also be able to sum across these rows to find the daily SEF totals (e.g., summing "Cleared_Notional_USD_DA" (field number 28) to find the daily SEF total cleared notional in USD).

It is important to note, along with notional and trade count totals, these variables also will define the set of prices used to determine fields 20–23. This will ensure comparable prices are combined together (e.g., ensure that block trade prices are not mixed with non-block trade prices).

Regarding swap product information related to fields 7 – 13, reporting markets should refer to the Swap Product Matrix provided by the NFA. Some swaps may not be represented. In such instances, the SEF should use their best judgement in assigning a value. If a response is not available, then please use 'other.' At this time, the CFTC does not expect to provide additional content to supplement the NFA Swap Product Matrix.

With respect to options, when option transactions are conducted in terms of volatility rather than option premiums, reporting markets may report option prices (fields 20 – 23) to the Commission in volatility terms. In such instances, reporting markets are instructed to include V in field 19. Notional value for options will be reported on a delta-adjusted and non-delta adjusted basis.

¹ Suggested values here will help to ensure the product matrix is as up-to-date as possible.

Description:	Daily trade activity for each swap. This report is a daily market summary report.
Frequency:	Daily trading business day, received 12:00 pm following business day.
Delivery Method:	Refer to Appendix A.

Technical Specifications

For purposes of this interim standard, the following fields comprise the values approved to satisfy the standard for Part 16 Swaps Daily Price and Volume Activity Reporting. The fields identified in the column 'Required M/MA' below are M => Mandatory; MA=> Mandatory where applicable.

N	Field Name	Required M/MA	Data Type	Description			
SEF I	SEF ID & Trade Date						
1	SEF_DCM_Name	M	String (30)	Reporting Market Name. (The reporting market is the SEF or the DCM that lists swaps for trading).			
2	SEF_DCM_LEI	М	String(20)	Use Legal Entity Identifier (LEI) of the reporting market.			
3	Trade_Date	М	DATE (YYYYMMDD)				
4	Effective_Date	М	DATE (YYYYMMDD)	Effective date is the date on which the terms of the swap become effective.			
SEF I	nternal Product ID & Description						
5	Internal_Prod_ID	М	String (100)	Reporting Market Internal Product ID			
6	Internal_Prod_Des	М	String (500)	Reporting Market Internal Product Description			
Swap	Product (NFA Swap Product Matri	x Approved	on Interim Basis) ²				
7	Asset_Class	M	String (10)	CD - Credit Default Swaps IR - Interest Rate Swaps CO - Other Commodity Swaps FX - Foreign Exchange Swaps ³ EQ - Equity Swaps			
8	Base_Prod	MA	String (10)	Base Product, refer to NFA Swap Product Matrix			
9	Sub_Prod	MA	String (10)	Sub Product, refer to NFA Swap Product Matrix			
10	Tran_Type	МА	String (30)	Transaction Type, refer to NFA Swap Product Matrix			
11	Contract_Type	MA	String (200)	Contract Type, refer to NFA Swap Product Matrix			
12	Curr_Code	МА	String (3)	Currency Code, refer to NFA Swap Product Matrix. See ISO 4217 Alphabetic Codes.			

² With respect to a product classification system that may be used for purposes of reporting part 16 swap data, Commission staff approves, on an interim basis, using the NFA Swap Product Matrix as noted in the Technical Specification. The NFA SWAP Product Matrix is available at http://www.cftc.gov/Forms/index.htm.

 $^{^{3}}$ Commission staff notes that this specification differs from the NFA Swap Product Matrix, which denotes foreign exchange with "CU."

13	Setl_Method	МА	String (4)	Settlement Method, refer to NFA Swap Product Matrix.
14	UPI	-	-	Unique Product Identifier (UPI). This field Is a placeholder reserved for use for a Commission designated UPI.
15	Block_Flag	М	String(1)	Indicate Y for Block and N for Non-Block Trade.
16	Option_Flag	М	String(1)	Indicate Y for Option and N for Non-Option.
Deriv	atives Clearing Organization			
17	DCO_Name	MA	String (30)	Name of the Derivatives Clearing Organization (DCO).
18	DCO_LEI	MA	String (20)	LEI of the DCO.
Price	Information			
19	Premium_Volatility_Other_Flag	М	String(1)	Indicate P if the price is represented as a premium and V if price is represented as a percentage and O for other representations. For example 12.5% should be sent as 12.5 for the fields 20-23.
20	First_Price	М	Number (20,8)	First observed trade price for the day.
21	High_Price	М	Number (20,8)	High price of the day.
22	Low_Price	М	Number (20,8)	Low price of the day.
23	Last_Price	М	Number (20,8)	Last observed trade price for the day.
Notic	onal Volume in Traded Currency			
24	Traded_Currency	MA	String(3)	Currency code of the traded currency. See ISO 4217 Alphabetic Codes.
25	Notional_Traded_Currency_DA	М	Number (24,4)	Notional in Traded Currency. For "Notional in Traded Currency DA", while reporting options, reporting markets are requested to report the notional value transacted with the delta adjustment (DA).
26	Notional_Traded_Currency_NDA	M	Number (24,4)	Notional in Traded Currency. For "Notional in Traded Currency NDA", while reporting options, reporting markets are requested to report the notional value transacted without the delta adjustment (NDA).
Notic	nal Volume in USD, Delta-adjusted	(DA) for opt	tions ⁴	
27	Total_Notional_USD_DA	М	Number (24,4)	Notional converted to USD. For options, report notional with delta adjustment.
28	Cleared_Notional_USD_DA	M	Number (24,4)	Cleared notional converted to USD. For options, report notional with delta adjustment.

 $^{^4}$ For options, reporting markets should report the delta-adjusted notional equivalent amount of the underlying instrument (e.g., the underlying swap, currency, index, etc.).

29	Un_Cleared_Notional_USD_DA	M	Number (24,4)	Uncleared notional converted to USD. For options, report notional with delta adjustment.
Notic	nal Volume in USD, Non Delta-adju	sted (NDA)	for options	
30	Total_Notional_USD_NDA	М	Number (24,4)	Notional converted to USD. For options, report notional without delta adjustment.
31	Cleared_Notional_USD_NDA	M	Number (24,4)	Cleared notional converted to USD. For options, report notional without delta adjustment.
32	Un_Cleared_Notional_USD_NDA	M	Number (24,4)	Uncleared notional converted to USD. For options, report notional without delta adjustment.
Trade	Trade Count			
33	Total_Trade_Count	М	Int(24)	Total count of all trades.
34	Cleared_Trade_Count	М	Int(24)	Total count of all cleared trades.
35	Un_Cleared_Trade_Count	М	Int(24)	Total count of all uncleared trades.

Requested file format (pipe delimited example)

SEF_DCM_Name|SEF_DCM_LEI|Trade_Date|Effective_Date|Internal_Prod_ID|Internal_Prod_Des|Asse t_Class|Base_Prod|Sub_Prod|Tran_Type|Contract_Type|Curr_Code|Setl_Method|UPI|Block_Flag|Opt ion_Flag|DCO_Name|DCO_LEI|Premium_Volatility_Other_Flag|First_Price|High_Price|Low_Price|Last _Price|Traded_Currency|Notional_Traded_Currency_DA|Notional_Traded_Currency_NDA|Total_Notional_USD_DA|Cleared_Notional_USD_DA|Un_Cleared_Notional_USD_DA|Total_Notional_USD_NDA|Cleared_Notional_USD_NDA|Un_Cleared_Notional_USD_NDA|Total_Trade_Count|Cleared_Trade_Count|Un_Cleared_Trade_Count

Appendix A: Delivery Method & Technical Requirements

a) Formats

The File Format for Part 16 Swaps Reporting is a pipe delimited text file. The field names provided in the previous section should be included as the first row in each text file.

b) Electronic Data Transmission Procedures

The electronic formatted records will be transmitted to the Commission using Secure FTP ("SFTP").

1. Formatting Data for Transmission

The records will be consolidated into a pipe-delimited text file as described in the previous sections. The file name for submission should be created in the following manner:

File Naming Convention

SEF16_[REPTYP] _[IDENT]_[YYYYMMDD].[FORMAT][."TEST"].gz

SEF16_MKTDATA_ABC_20131219.csv.TEST.gz

Where:

REPTYP:

Report Type	REPTYP in Filename
Part 16.01 Market data	MKTDATA

An earlier SFTP communication sent on 1/9/2014, the file naming convention included the asset class. Asset class is now included as a field in the interim standard, so it is no longer part of the file naming convention. We are only requesting a single Part 16 Swaps MKTDATA file at this time.

<u>IDENT</u>: Market Identifier Code (MIC) [http://www.iso15022.org/MIC/homepageMIC.htm] should be used in the file name for the [IDENT]. Note in the earlier SFTP communication sent on 1/9/2014 the 3-5 character identifier provided by the CFTC during the account registration process was part of the file naming convention if a SEF did not have a MIC at the time. The MIC is preferred as part of this standard and going forward.

<u>YYYYMMDD</u>: This field is the Year (4 digits), Month and day of the report date. The date of the data, not the date the file is sent.

<u>TEST</u>: This field, if present (use the word "TEST") tells the CFTC that this data is for testing purposes only, and will not be loaded into a production—system. We will load the test data into our test systems, and can optionally provide feedback regarding the structure and content of the file at the reporting markets request.

2. Assembly and Compression

After assembling the data file, it should be compressed using the GZIP or Winzip utility. The GZIP utility is freely available at http://www.gzip.org. Following the example provided above, the zipped file name would be SEF16_MKTDATA_ABC_20110922.gz. The file will then be transmitted to the CFTC using Secure FTP. The instructions for registering for a Secure FTP account follow.

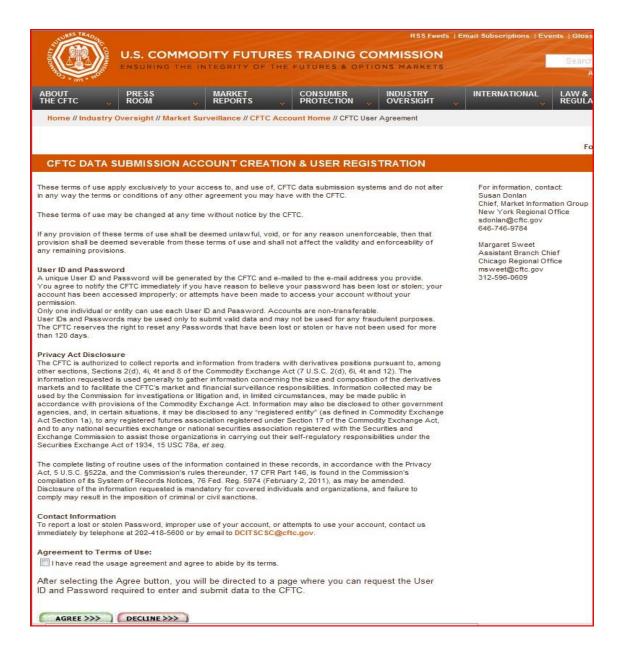
3. Secure FTP Account Registration

The compressed files will be submitted to the CFTC via Secured File Transfer Protocol (SFTP). Many entities providing Part 16 swap data reporting already have FTP or SFTP accounts. Reporting markets with SFTP accounts can continue to use those accounts for this reporting requirement. New reporters who do not already have an SFTP account, or reporters who only use non-secure FTP accounts, must request a Secure FTP account from the CFTC. The following steps describe the process for that request.

i) Registration Step 1:

Users will browse to the Account Creation Page on the Commission's website (https://accountcreation.cftc.gov/CFTCAccount.aspx). Users will be presented with a CFTC Usage Agreement for review.

Users will be required to confirm that they have read the agreement and agree to abide by its terms by clicking the checkbox and pressing the "Agree" button.



ii) Registration Step 2:

Users will be presented with the Account Creation page where they will be asked to supply:

- (1) First Name The first name of the user requesting the account
- (2) Last Name The last name (or surname) of the user requesting the account
- (3) Company Name The Company that will be supplying the data to the CFTC
- (4) Email Address The email address of the contact. The email address must be from the domain that will be submitting data; the Reporting markets domain. Third party email domains (e.g., Hotmail, Yahoo!, Gmail, etc.) will not be accepted.
- (5) Contact Telephone Number The requestor's phone number, in case CFTC will need to confirm the user via a phone call.
- (6) Contact FAX Number (not required)

REQUEST ACCOUNT CREATION FOR DATA SUBMISSION TO THE CFTC Registration Restriction: [Email Confirmation Reguired.] We recommend that you routinely change your password. The CFTC reserves the right to reset any Passwords that have been lost or stolen or have not been used for more than 120 days; The CFTC reserves the right to modify, suspend, deactivate, terminate or delete any account that violates any part of Submission Account Creation & User Registration Agreement. Accounts are non-transferable. Please enter the following information *Requester first name: *Requester last name: *Company name: *Email address: Email address must be the domain from which data submissions will be made. Third party email domains, e.g., hotmail, yahoo, will be rejected. *Confirm email address: *Telephone: Fax: *Required Field Submit Reset

Once the user has submitted the data, the request will be passed to CFTC's Office of Data and Technology for approval.

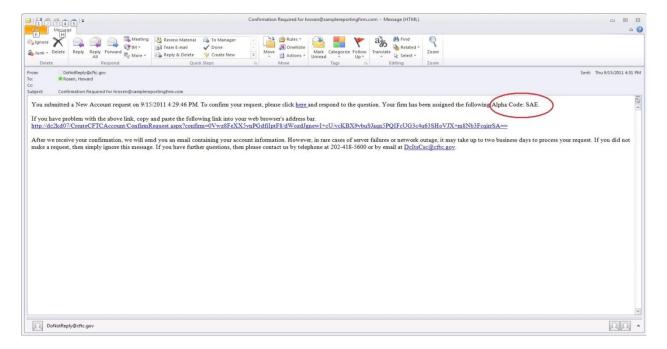
REQUEST ACCOUNT CREATION FOR DATA SUBMISSION TO THE CFTC

The CFTC will review your request and send you an email after your request has been processed.

Return to CFTC.gov

iii) Registration Step 3:

Once the account creation is approved, the user will be sent an email with a link to confirm the request. This email will include the three-letter Alpha Code that must be used for all data submissions made by this company to the CFTC.



Clicking the link (or posting the URL into a browser) will bring users to the account confirmation screen where they will be asked to confirm the account creation request by typing in the three-letter Alpha Code supplied in the email.

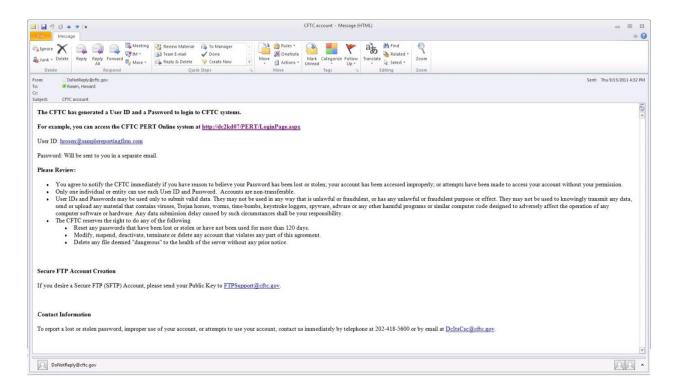


Once the user has confirmed the Alpha Code, the page will tell them that their request has been submitted.



iv) Registration Step 4:

The user will receive two follow-on emails from the CFTC. Each email will address guidelines for using this account. One email will contain the user's new ID. It will also contain instructions on converting their FTP Account to a Secure FTP Account. All entities that are providing Part 16 swap reporting must use Secure FTP to transmit their data.



v) Registration Step 5:

All reporting markets must exchange their Public Keys with the CFTC to activate their Secure FTP account. Please send your Public Key to FTPSupport@cftc.gov. The second email will contain the user's new password for the FTP account.

File Transmission

Connect to the CFTC FTP site at traders.cftc.gov, and login using your account and password. At this point, the compressed file can be transferred using normal FTP commands.

Upon file receipt, software at the CFTC will ingest the file through our firewall and begin processing of the data.

c) Technical Support

Please forward questions regarding format, content, and transmission of Part 16 swap data submissions to the CFTC at Part16TechSupport@cftc.gov.

Appendix B: Validations

Valid ation Num ber	Validation Requirement	Part 16 SEF Specification Element
1	Invalid Filename. Format must be SEF16_[REPTYP]_[IDENT]_[YYYYMMDD].[FORMAT][."TEST"].gz or SEF16_[REPTYP]_[IDENT]_[YYYYMMDD].[FORMAT][."TEST"].zip.	Appendix A (b)(i)
2	Invalid File Header. Either the file header is missing or contains invalid header data. The file must contain the header as specified in the "Report Column Headings Summary" section of the specification document. The header must look like as follows: SEF_DCM_Name SEF_DCM_LEI Trade_Date Effective_Date Internal_Prod_ID Internal_Prod_Des Asset_Class Base_Prod Sub_Prod Tran_Type Contract_Type Curr_Code Setl_Method UPI Block_Flag Option_Flag DCO_Name DCO_LEI Premium_Volatility_Other_Flag First_Price High_Price Low_Price Last_Price Traded_Currency Notional_Traded_Currency_DA Notional_Traded_Currency_NDA Total_Notional_USD_DA Cleared_Notional_USD_DA Un_Cleared_Notional_USD_DA Total_Notional_USD_NDA Cleared_Notional_USD_NDA Un_Cleared_Notional_USD_NDA Total_Trade_Count Cleared_Trades_Count Un_Cleared_Trades_Count	Report Column Headings Summary
3	Missing or Invalid SEF_DCM_Name. The SEF_DCM_Name cannot be longer than 30 characters. The document must contain a valid Reporting Market Name.	1
4	Missing or Invalid SEF_DCM_LEI. The SEF_DCM_LEI should be identifiable in the LEI database. The document must contain a valid Legal Entity Identifier (LEI) of the Reporting Market.	2
5	Missing Trade_Date or Invalid Trade_Date Format. The acceptable format is YYYYMMDD. The document must provide a valid Trade Date for each asset class.	3

6	Missing Effective_Date or Invalid Effective_Date Format. The acceptable format is YYYYMMDD. The document must provide a valid Effective date on which the terms of the swap become effective.	4
7	Missing or Invalid Internal_Prod_ID. The Internal_Prod_ID cannot be longer than 100 characters. The document must contain a Reporting Market Internal Product ID.	5
8	Missing or Invalid Internal_Prod_Des. Internal_Prod_Des cannot be longer than 500 characters. The document must contain a Reporting Market Internal Product Description.	6
9	Missing or Invalid The Asset_Class. The allowable values are: CD - Credit Default Swaps IR - Interest Rate Swaps CO - Other Commodity Swaps FX - Foreign Exchange Swaps EQ - Equity Swaps The document must provide a valid Asset Class code as specified in the NFA Swap Product Matrix v1.4.	7
10	Invalid Curr_Code. Please refer to ISO 4217 Alphabetic Codes for valid values. If Currency Code is provided in the document, the document must contain a valid Currency Code as specified in the ISO 4217 Alphabetic Codes list.	12
11	Invalid or missing Block_Flag. The allowable values are: Y or N The document must specify either Y or N for Block Flag. No other value will be accepted.	15
12	Invalid or missing Option_Flag. The allowable values are: Y or N The document must specify either Y or N for Option Flag. No other value will be accepted.	16

13	DCO_Name is longer than 30 characters. If Derivatives Clearing Organization (DCO) is provided in the document, it should be less than or equal to 30 characters	17
14	DCO_LEI could not be identified in the LEI database. If provided, the document must contain a valid DCO Legal Entity Identifier (LEI) which could be identified in CFTC LEI database.	18
15	Missing or Invalid Premium_Volatility_Other_Flag. The allowable values are P, V or O The document must specify P, V or O for Premium, Volatility or Other Flag as instructed in the specification document. No other values will be accepted.	19
16	Missing or incorrectly formatted First_Price. The allowable format is Number (20, 8) The document must provide valid First Price as instructed in the specification document. The acceptable format is Number (20, 8). That is, the total number of digits allowed is 20 of which 12 digits are acceptable before the decimal point. If the number of digits after the decimal point is more than 8, the system will accept only the first 8 digits after the decimal point and ignore the rest.	20
17	Missing or incorrectly formatted High_Price. The allowable format is Number (20, 8) The document must provide valid High Price of the day as instructed in the specification document. The acceptable format is Number (20, 8). That is, the total number of digits allowed is 20 of which 12 digits are acceptable before the decimal point. If the number of digits after the decimal point is more than 8, the system will accept only the first 8 digits after the decimal point and ignore the rest.	21
18	Missing or incorrectly formatted Low_Price. The allowable format is Number (20, 8) The document must provide valid Low Price of the day as instructed in the specification document. The acceptable format is Number (20, 8). That is, the total number of digits allowed is 20 of which 12 digits are acceptable before the decimal point. If the number of digits after the decimal point is more than 8, the system will accept only the first 8 digits after the decimal point and ignore the rest.	22

19	Missing or incorrectly formatted Last_Price. The allowable format is Number (20, 8) The document must provide valid Last Price as instructed in the specification document. The acceptable format is Number(20, 8). That is, the total number of digits allowed is 20 of which 12 digits are acceptable before the decimal point. If the number of digits after the decimal point is more than 8, the system will accept only the first 8 digits after the decimal point and ignore the rest.	23
20	Invalid Traded_Currency. Please refer to ISO 4217 Alphabetic Codes. If provided, the document must contain valid Traded Currency from ISO 4217 Alphabetic Codes list.	24
21	Missing or incorrectly formatted Notional_Traded_Currency_DA. The allowable format is Number (24, 4) The document must provide valid Notional in Traded Currency (single count) as instructed in the specification document. The acceptable format is Number(24, 4). That is, the total number of digits allowed is 24 of which 20 digits are before the decimal point. If number of digits after the decimal point is more than 4, the system will accept only the first 4 digits after the decimal point and ignore the rest.	25
22	Missing or incorrectly formatted Notional_Traded_Currency_NDA. The allowable format is Number (24, 4) The document must provide valid Notional in Traded Currency (Single count) as instructed in the specification document. The acceptable format is Number(24, 4). That is, the total number of digits allowed is 24 of which 20 digits are before the decimal point. If number of digits after the decimal point is more than 4, the system will accept only the first 4 digits after the decimal point and ignore the rest.	26
23	Missing or incorrectly formatted Total_Notional_USD_DA. The allowable format is Number (24, 4) The document must provide this value as instructed in the specification document. The Total_Notional_USD_DA must be equal to sum of Cleared_Notional_USD_DA and Un_Cleared_Notional_USD_DA. The acceptable format for Total_Notional_USD_DA is Number(24, 4). That is, the total number of digits allowed is 24 of which 20 digits are before the decimal point. If number of digits after the decimal point is more than 4, the system will accept only the first 4 digits after the decimal point and ignore the rest.	27

24	Total_Notional_USD_DA should be the sum of Cleared_Notional_USD_DA and Un_Cleared_Notional_USD_DA The document must provide this value as instructed in the specification document. The Total_Notional_USD_DA must be equal to sum of Cleared_Notional_USD_DA and Un_Cleared_Notional_USD_DA. The acceptable format for Total_Notional_USD_DA is Number(24, 4). That is, the total number of digits allowed is 24 of which 20 digits are before the decimal point. If number of digits after the decimal point is more than 4, the system will accept only the first 4 digits after the decimal point and ignore the rest.	27
25	Invalid or missing Cleared_Notional_USD_DA. The allowable format is Number (24, 4) The document must provide valid value as instructed in the specification document. The acceptable format is Number(24, 4). That is, the total number of digits allowed is 24 of which 20 digits are before the decimal point. If number of digits after the decimal point is more than 4, the system will accept only the first 4 digits after the decimal point and ignore the rest.	28
26	Invalid or missing Un_Cleared_Notional_USD_DA. The allowable format is Number (24, 4) The document must provide valid value as instructed in the specification document. The acceptable format is Number(24, 4). That is, the total number of digits allowed is 24 of which 20 digits are before the decimal point. If number of digits after the decimal point is more than 4, the system will accept only the first 4 digits after the decimal point and ignore the rest.	29
27	Missing or incorrectly formatted Total_Notional_USD_NDA. The allowable format is Number (24, 4) The document must provide valid value as instructed in the specification document. The Total_Notional_USD_NDA must be equal to sum of Cleared_Notional_USD_NDA and Un_Cleared_Notional_USD_NDA. The acceptable format for Total_Notional_USD_NDA is Number(24, 4). That is, the total number of digits allowed is 24 of which 20 digits are before the decimal point. If number of digits after the decimal point is more than 4, the system will accept only the first 4 digits after the decimal point and ignore the rest.	30

28	Total_Notional_USD_NDA should be the sum of Cleared_Notional_USD_NDA and Un_Cleared_Notional_USD_NDA The document must provide valid value as instructed in the specification document. The Total_Notional_USD_NDA must be equal to sum of Cleared_Notional_USD_NDA and Un_Cleared_Notional_USD_NDA. The acceptable format for Total_Notional_USD_NDA is Number(24, 4). That is, the total number of digits allowed is 24 of which 20 digits are before the decimal point. If number of digits after the decimal point is more than 4, the system will accept only the first 4 digits after the decimal point and ignore the rest.	30
29	Invalid or missing Cleared_Notional_USD_NDA. The allowable format is Number (24, 4) The document must provide valid value as instructed in the specification document. The acceptable format is Number(24, 4). That is, the total number of digits allowed is 24 of which 20 digits are before the decimal point. If number of digits after the decimal point is more than 4, the system will accept only the first 4 digits after the decimal point and ignore the rest.	31
30	Invalid or missing Un_Cleared_Notional_USD_NDA. The allowable format is Number (24, 4) The document must provide valid value as instructed in the specification document. The acceptable format is Number(24, 4). That is, the total number of digits allowed is 24 of which 20 digits are before the decimal point. If number of digits after the decimal point is more than 4, the system will accept only the first 4 digits after the decimal point and ignore the rest.	32
31	Invalid or missing Total_Trade_Count. The allowable format is Integer(24) The document must provide valid value as instructed in the specification document. The Total_Trade_Count must be equal to sum of Cleared_Trades_Count and Un_Cleared_Trades_Count. The acceptable format for Total_Trade_Count is Number(24). That is, it cannot have more than 24 digits and it cannot have a decimal point.	33

32	The Total_Trade_Count should be equal to the sum of Cleared_Trades_Count and Un_Cleared_Trades_Count. The document must provide valid value as instructed in the specification document. The Total_Trade_Count must be equal to sum of Cleared_Trades_Count and Un_Cleared_Trades_Count. The acceptable format for Total_Trade_Count is Number(24). That is, it cannot have more than 24 digits and it cannot have a decimal point.	33
33	Invalid or missing Cleared_Trades_Count. The allowable format is Number (24, 4) If provided, the document must provide valid value as instructed in the specification document. The acceptable format for Cleared_Trades_Count is Number(24). That is, it cannot have more than 24 digits and it cannot have a decimal point.	34
34	Invalid or missing Un_Cleared_Trades_Count. The allowable format is Number (24, 4) If provided, the document must provide valid value as instructed in the specification document. The acceptable format for Un_Cleared_Trades_Count is Number(24). That is, it cannot have more than 24 digits and it cannot have a decimal point.	35

Appendix C: Frequently Asked Questions

1. Will other formats besides Pipe delimited be accepted?

We will only accept pipe delimited files.

2. What other file formats will you accept?

We are currently accepting .gz and .zip files.

3. Is the existing CFTC/traders directory sufficient?

Yes.

4. Are there any restrictions to special characters (_, -, ', @, &) for Internal_Prod_ID and Internal Prod Des?

Characters 32-126 of ASCII code are acceptable for text fields.

5. When the swap is not executed in \$US, is there a specific site from which SEFs should be pulling the FX rates?

The Commission has not designated a source of FX rates and is not doing so in this specification. The reporting market should use a reasonable, reputable source for FX rates.

6. For FX rates, should SEFs be using the rate at the time of the trade (real-time) or at the time of aggregation at the end of the day?

Staff suggests using time of aggregation at end of day.

7. Are there any special instructions for SEFs when trades occur on a weekend or a holiday?

Reporting markets must submit data that corresponds with this specification in accordance with § 16.01 of the Commission's regulations. Data must be submitted within the timeframes required by § 16.01(d) of the Commission's regulations. Staff notes that "business day" is defined in § 1.3(b) of the Commission's regulations as "any day other than a Sunday or holiday."

8. What reporting obligation is there on trading days with no activity? Is a SEF required to send a blank file or send no file?

Please send in a blank file with only the header row for all trading days with no activity.

9. If the reporting party is both a SEF and DCM with the same LEI, can it file separately? Filing for the SEF and DCM separately is permitted. Ensure that the two file names are distinct by having 2 MIC codes or 2 CFTC issued codes, one for SEF and one for DCM.