

SUBMISSION COVER SHEET

Registered Entity Identifier Code (optional)

Date: 09/29/2013

IMPORTANT: CHECK BOX IF CONFIDENTIAL TREATMENT IS REQUESTED.

ORGANIZATION

GFI Swaps Exchange LLC

FILING AS A:

DCM

SEF

DCO

SDR

ECM/SPDC

TYPE OF FILING

• Rules and Rule Amendments

- Certification under § 40.6 (a) or § 41.24 (a)
- "Non-Material Agricultural Rule Change" under § 40.4 (b)(5)
- Notification under § 40.6 (d)
- Request for Approval under § 40.4 (a) or § 40.5 (a)
- Made Available To Trade Determination under § 40.5 or § 40.6
- Advance Notice of SIDCO Rule Change under § 40.10 (a)

• Products

- Certification under § 40.2 (a) or § 41.23 (a)
- Submission under § 39.5
- Swap Class Certification under § 40.2 (d)
- Request for Approval under § 40.3 (a)
- Novel Derivative Product Notification under § 40.12 (a)

RULE NUMBERS

N/A

DESCRIPTION

Self-Certification of a Class of Uncleared Credit Default Swaps



September 29, 2013

BY ELECTRONIC MAIL: submissions@cftc.gov

Melissa Jurgens
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

**Re: Commission Regulations 40.2(a) and 40.2(d) –
Class Certification of Uncleared Credit Default Swaps**

Dear Ms. Jurgens:

GFI Swaps Exchange LLC (“GFI”) hereby notifies the Commodity Futures Trading Commission (the “Commission”), pursuant to Commission Regulations 40.2(a) and 40.2(d), that it is certifying a class of uncleared credit default swaps (“CDS”) based on the North American CDX Index Family, North American Loan CDX Index, iTraxx Index Family, ABX Index Family, CMBX Index, IOS Index, MBX Index, PO Index, PrimeX Index and TRX Index (each, an “Index”) for trading on GFI’s electronic trading platform (the “Trading Platform”).

GFI will list the class of CDS no earlier than October 2, 2013.

This submission letter contains the following attachments:

- The submission cover sheet.
- Attached as Exhibit A, a concise explanation and analysis of CDS.
- Attached as Exhibit B, a copy of the CDS Rules, which will be published as contract specifications on GFI’s website in accordance with GFI Rule 1101.
- Attached as Exhibit C, a concise explanation and analysis of the products’ compliance with applicable provisions of the Commodity Exchange Act (the “CEA”), including the Core Principles, and the Commission’s Regulations thereunder.

As required by Commission Regulation 40.2(d)(1), GFI hereby certifies that:

- (i) That each particular swap within the certified class of swaps is based upon an “excluded commodity” specified in Regulation 40.2(d)(1);
- (ii) That each particular swap within the certified class of swaps is based upon an excluded commodity with an identical pricing source, formula, procedure, and methodology for calculating reference prices and payment obligations;



(iii) That the pricing source, formula, procedure, and methodology for calculating reference prices and payment obligations in each particular swap within the certified class of swaps is identical to a pricing source, formula, procedure, and methodology for calculating reference prices and payment obligations in a product previously submitted to the Commission and certified or approved pursuant to Regulation 40.2 or Regulation 40.3; and

(iv) That each particular swap within the certified class of swaps is based upon an excluded commodity involving an identical currency or identical currencies.

GFI certifies that each CDS complies with the CEA and Commission Regulations thereunder. GFI additionally certifies that it has concurrently posted a copy of this submission letter and attachments hereto on GFI's website.

* * *

In the event that you have questions, please contact the undersigned at (212) 968-2982 or daniel.glatter@gfigroup.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Daniel E. Glatter', with a large, sweeping flourish at the end.

Daniel E. Glatter



Exhibit A

Below is a concise explanation and analysis of the CDS:

A credit default swap is a derivative transaction that allows for one party to transfer to another party for an agreed period of time the credit risk associated with a single reference entity, a group of several reference entities or an index of reference entities (an "Index CDS"). In each CDS, one party (the "Buyer") pays a cash premium (the "Premium") to the other party (the "Seller") to purchase credit protection against the occurrence of an adverse event (a "Credit Event") with respect to the reference entity or entities. The most common Credit Events are bankruptcy, failure to pay obligations and restructuring of obligations. The credit protection can relate to a specific type of obligation or all obligations of a reference entity and is expressed in terms of a notional amount of the relevant obligations. Selling credit protection is economically equivalent to owning the relevant obligations. Buying credit protection is economically equivalent to selling those obligations short.

If a Credit Event occurs before the maturity date of a CDS, the Seller must make a payment to the Buyer in accordance with the settlement terms of the CDS. In general, there are two ways to settle a CDS, with the choice being made at the initiation of the contract: physical settlement and cash settlement. Physical settlement requires the Buyer to deliver the notional amount of deliverable obligations of the reference entity to the Seller in return for the notional amount paid in cash. In cash settlement, a cash payment is made by the Seller to the Buyer equal to par minus the recovery rate of the reference asset, with recovery rate being calculated by referencing dealer quotes or observable market prices over some period after default has occurred. Market practice for CDS has become more uniform since 2009 under the auspices of the International Swaps and Derivatives Association, Inc. so that cash settlement is now the norm, Credit Events are determined by committees made up of market practitioners and settlement prices for obligations are determined by standardized auctions.

Index CDS are swaps with highly standardized market terms. The North American CDX Indices are owned and administered by Markit Group Limited.¹ The various North American Corporate Credit Indices contain North American and Emerging Market corporate reference entities.

North American CDX Index

The North American CDX Index family includes the following indices: North American Investment Grade CDX Index ("IG CDX"), which contains 125 North American corporate reference entities; North American High Yield CDX Index ("HY CDX"), which contains 100 North American corporate reference entities; and Emerging Market CDX Index ("EM CDX"), which contains 40 emerging market nation corporate reference entities.

iTraxx Index

The Markit iTraxx Asian indices comprise of Markit iTraxx Asia ex-Japan index (a 50 equally-weighted investment grade CDS index of Asian entities), a Markit iTraxx Australia index (25

¹http://www.markit.com/assets/en/docs/products/data/indices/credit-and-loan-indices/Credit_Indices_Primer_Apr_2013.pdf



equally-weighted Australian entities) and a Markit iTraxx Japan index (50 equally-weighted CDS of Japanese entities). The iTraxx Europe Index family includes the following indices: iTraxx Europe, which is composed of 125 liquid European corporate reference entities with investment grade credit ratings that trade in the CDS market; iTraxx Europe Crossover, which is composed of up to 50 European corporate reference entities with non-investment grade credit ratings that trade in the CDS market; iTraxx Europe HiVol, which contains 30 of the widest spread non-financial corporate reference entities from Europe, Asia and emerging markets; iTraxx Europe Senior Financials, which is composed of the 25 corporate financial entities from the Markit iTraxx Europe index referencing senior debt; and iTraxx Europe Subordinated Financials, which is composed of the 25 corporate financial entities from the Markit iTraxx Europe index referencing subordinated debt.

The indices in the Markit iTraxx SovX family are the Markit iTraxx SovX Western Europe Index (comprising 15 names from the Eurozone region plus Denmark, Norway, Sweden and United Kingdom that trade on Western European documentation), the Markit iTraxx SovX CEEMEA Index (comprising 15 names in the Central & Eastern Europe, Middle East and African countries that trade on Emerging Markets documentation), Markit iTraxx SovX CEEMEA ex-EU (A subset of constituents of the Markit iTraxx SovX CEEMEA Index which do not form part of the European Economic area), the Markit iTraxx SovX Asia Pacific Index (comprising 10 names from the Asia and Oceania regions), the Markit SovX Latin America Index (comprising 8 names from the Latin America region), the Markit iTraxx SovX Global Liquid Investment Grade Index (comprising the most liquid high grade sovereign entities), the Markit iTraxx SovX G7 Index (comprising entities from the G7 universe) and the Markit iTraxx SovX BRIC Index (comprising the most liquid BRIC entities).

The Markit iTraxx LevX indices are the first European indices on Leveraged Loans CDS. They are constructed from the universe of European corporates with leveraged loan exposures. The Markit iTraxx LevX Senior Series 6 Index comprises the 40 most liquid 1st lien credit agreements traded in the European Leveraged Loan CDS market.

The Markit ABX index is composed of the 20 most liquid CDS on US home equity ABS. The ABX index is the key trading tool for banks and asset managers that want to hedge asset-backed exposure or take a position in this asset class.

The Markit IOS, Markit PO and Markit MBX indices are synthetic Total Return Swap index series that allow investors to gain exposure to the interest and principal components of agency mortgage pools. The original IOS indices launched on March 12, 2010 were built to reference the interest component of three coupons of Fannie agency pools (4%, 4.5%, and 5%). Since then, subsequent indices have been launched referencing additional coupons and GSEs.

Markit CMBX is a synthetic index referencing 25 commercial mortgage-backed securities. The Markit CMBX Indices were created in response to the rapid pace of growth in the CDS of CMBS market, providing investors with an efficient, standardized tool to quickly gain exposure to this asset class.



The Markit PrimeX index is a synthetic CDS index referencing non-Agency Prime RMBS. Each sub-index references 20 Prime RMBS deals from 2005, 2006, and 2007. The index launched on April 28th, 2010.

The Markit TABX.HE, or the Markit ABX.HE Tranche Indices, are constructed using the underlying names of the BBB and BBB- Markit ABX.HE Indices. The goal of Markit TABX.HE is to provide investors with the ability to gain/hedge their exposure on the underlying names to specific tranches of varying levels of risk within the portfolio structures.

The Markit TRX indices are total return swap indices referencing Commercial Mortgage Backed Securities with an original rating of AAA. The index family was created for investors to use to gain exposure to the appreciation and/or depreciation of a standardized basket of cash securities via a TRS contract. Markit's ownership and administration of the TRX index brings consensus based pricing and trade standardization to the total return market for CMBS.

North American CDX Index Tranches

North American CDX Index Tranches are synthetic collateralized debt obligations (CDOs) based on North American CDX indices, where each tranche references a different segment of the loss distribution of the underlying CDS index. North American CDX Index Tranches are standardized contracts both in the composition of the reference pool and the structure ("width") of the tranches.

Tranches have been issued on the North American Investment Grade CDX Index ("IG CDX") and on the North American High Yield CDX Index ("HY CDX"). There are five tranches based on this IG CDX. The lowest tranche, known as the equity tranche, absorbs the first 3% of losses on the index due to defaults. If defaults occur over the lifetime of the tranche contract, the investor in an equity tranche is obliged to pay its counterparty an amount equal to the losses from default (the difference between par and the recovery price of the defaulted asset) up to a maximum of 3% of the total index. The next tranche (mezzanine) absorbs losses of 3–7% and is therefore fully insulated, by the equity tranche, from losses up to 3%. Further losses are absorbed by higher-ranking tranches. The 7–10% and 10–15% tranches are known as the senior tranches, while the super-senior tranche covers losses of 15–30%. There are also five tranches based on the HY CDX: 0%-5%, 5%-8%, 8%-12%, 12%-15% and 15%-100%.

In return for bearing the risk of losses, sellers receive a quarterly payment from buyers of protection equal to a premium times the effective outstanding notional amount of a given tranche. The premiums on the mezzanine and senior tranches are a running spread with no upfront payment. By contrast, buyers of protection on an equity tranche make an upfront payment that is a percentage of the original notional of the contract, in addition to paying a running spread premium of 500 basis points..

Loan CDX Index Tranches



Loan CDX Index Tranches are synthetic collateralized debt obligations (CDOs) based on Loan CDX indices, where each tranche references a different segment of the loss distribution of the underlying CDS index. Loan CDX Index Tranches are standardized contracts both in the composition of the reference pool and the structure (“width”) of the tranches.

Loan CDX Index Tranche is comprised of four tranches based on the Loan CDX Index. The lowest tranche, known as the equity tranche, is from 0%-8%, and absorbs the first 8% of losses on the index due to defaults. If defaults occur over the lifetime of the tranche contract, the investor in an equity tranche is obliged to pay its counterparty an amount equal to the losses from default (the difference between par and the recovery price of the defaulted asset) up to a maximum of 8% of the total index. The next three tranches absorb losses of 8%-15%, 15%-30%, and 30%-100%.

In return for bearing the risk of losses, sellers receive a quarterly payment from buyers of protection equal to a premium times the effective outstanding notional amount of a given tranche.

iTraxx Europe Index Tranches

iTraxx Europe Index Tranches are synthetic collateralized debt obligations (CDOs) based on iTraxx Europe indices, where each tranche references a different segment of the loss distribution of the underlying CDS index. iTraxx Europe Index Tranches are standardized contracts both in the composition of the reference pool and the structure (“width”) of the tranches.

Tranches have been issued on the iTraxx Europe Index (“IG CDX”). There are six tranches based on this Index. The lowest tranche, known as the equity tranche, is from 0%-3%, and absorbs the first 3% of losses on the index due to defaults. If defaults occur over the lifetime of the tranche contract, the investor in an equity tranche is obliged to pay its counterparty an amount equal to the losses from default (the difference between par and the recovery price of the defaulted asset) up to a maximum of 3% of the total index. The next five tranches absorb losses of 3%-6%, 6%-9%, 9%-12%, 12%-22% and 22%-100%.

In return for bearing the risk of losses, sellers receive a quarterly payment from buyers of protection equal to a premium times the effective outstanding notional amount of a given tranche.

For more information, the contract specifications for any of the CDS is attached as Exhibit B.

Exhibit B

GFI Contract Specifications

Swap Specifications Pursuant to Rule 1101

North American CDX Index Family

Contract Overview	An agreement to buy or sell protection on a basket of liquid North American based entities with an investment grade or high yield credit rating.
Index Names	CDX.NA.IG CDX.NA.IG Tranche CDX.NA.IG Standard Tranche CDX.NA.HY CDX.NA.HY Tranche CDX.NA.HY Standard Tranche CDX.NA. XO CDX.NA. XO Tranche CDX.EM CDX.EM Tranche CDX.EM Diversified CDX Blended Tranche CDX Risky zero Tranche LCDX.NA LCDX.NA Tranche LCDX.NA Standard Bullet LCDX.NA Bullet Tranche MCDX.NA MCDX.NA Tranche
Currency	USD
Quoting Convention and Minimum Increment	As agreed by the counterparties.
Minimum Size	As agreed by the counterparties.
Trading Conventions	Buy = Buy Protection, the buyer of protection pays a premium to the seller in case of a credit event occurring. Credit events include Bankruptcy and Failure to Pay. Sell = Sell Protection, the seller of protection receives the premium payments from the protection buyer. The Seller owns the credit risk of the instrument. Investment Grade indices are traded on spread
Swap Conventions	Fixed coupon payments are calculated at a spread of 100 bps and exchanged on a quarterly basis.
Swap Tenor	As agreed by the counterparties.

Effective Date	The date on which the counterparties begin calculating accrued obligations such as fixed payments (i.e., start date of the swap).
Maturity Date	The final date on which the obligations no longer accrue and the final payment occurs.
Trade Types	Outrights; roll trades; curve trades.
Settlement	Contingent payment - Payments related to credit event settlement will be determined pursuant to the 2009 ISDA Credit Derivatives Determination Committees and Auction Settlement Supplement, (i.e., the Big Bang Protocol). Fixed Quarterly cash payments - reflected in basis points and paid by the protection buyer to the protection seller. Upfront fee payment - The upfront fee is a portion of the payments, expressed in percentage points of the notional, which is present valued and paid immediately to the seller.
Trading Hours	00:01-24:00pm (ET), Sunday-Friday
Block Size	As set forth in Appendix F to Part 43 of the Commission Regulations.
Speculative Limits	As set in Part 151 of the CFTC Regulations.
Reportable Levels	As set in the CFTC Regulation 15.03.

iTraxx Europe Index Family

Contract Overview	An agreement to buy or sell protection on a basket of liquid European based entities with an investment grade or high yield credit rating.
Index Names	iTraxx Europe iTraxx Europe Tranche iTraxx Europe Standard Tranche iTraxx Japan iTraxx Japan Tranche iTraxx Asia Ex Japan iTraxx Asia Ex Japan Tranche iTraxx Australia iTraxx Australia Tranche iTraxx Blended Tranche iTraxx Risky Zero Tranche iTraxx Lev X iTraxx Sov X iTraxx SDI
Currency	EUR
Quoting Convention and Minimum Increment	As agreed by the counterparties.
Minimum Size	As agreed by the counterparties.
Trading Conventions	Buy = Buy Protection, the buyer of protection pays a premium to the seller in case of a credit event occurring. Credit events include Bankruptcy and Failure to Pay. Sell = Sell Protection, the seller of protection receives the premium

	payments from the protection buyer. The Seller owns the credit risk of the instrument.
	Investment Grade indices are traded on spread
Swap Conventions	Fixed coupon payments are calculated at a spread of 100 bps and exchanged on a quarterly basis.
Swap Tenor	As agreed by the counterparties.
Effective Date	The date on which the counterparties begin calculating accrued obligations such as fixed payments (i.e., start date of the swap).
Maturity Date	The final date on which the obligations no longer accrue and the final payment occurs.
Trade Types	Outrights; roll trades; curve trades.
Settlement	Contingent payment - Payments related to credit event settlement will be determined pursuant to the 2009 ISDA Credit Derivatives Determination Committees and Auction Settlement Supplement, (i.e., the Big Bang Protocol). Fixed Quarterly cash payments - reflected in basis points and paid by the protection buyer to the protection seller. Upfront fee payment - The upfront fee is a portion of the payments, expressed in percentage points of the notional, which is present valued and paid immediately to the seller.
Trading Hours	00:01-24:00pm (ET), Sunday-Friday.
Block Size	As set forth in Appendix F to Part 43 of the Commission Regulations.
Speculative Limits	As set in Part 151 of the CFTC Regulations.
Reportable Levels	As set in the CFTC Regulation 15.03.

Mortgage Indices

Contract Overview	An agreement to buy or sell protection on a basket of subprime, prime, commercial and/or AAA commercial mortgage-backed securities; synthetic total return swap index of 30-year, fixed-rate Fannie Agency pools; and/or interest and principal components of Agency pools.
Index Names	ABX HE ABX Tranche CMBX MBX PrimeX TRX PO IOS
Currency	USD
Quoting Convention and Minimum Increment	As agreed by the counterparties.
Minimum Size	As agreed by the counterparties.
Trading Conventions	Buy = Buy Protection, the buyer of protection pays a premium to the seller in case of a credit event occurring. Credit events include

	<p>Bankruptcy and Failure to Pay.</p> <p>Sell = Sell Protection, the seller of protection receives the premium payments from the protection buyer. The Seller owns the credit risk of the instrument.</p>
	Investment Grade indices are traded on spread
Swap Conventions	Fixed coupon payments are calculated at a spread of 100 bps and exchanged on a quarterly basis.
Swap Tenor	As agreed by the counterparties.
Effective Date	The date on which the counterparties begin calculating accrued obligations such as fixed payments (i.e., start date of the swap).
Maturity Date	The final date on which the obligations no longer accrue and the final payment occurs.
Trade Types	Outrights; roll trades; curve trades.
Settlement	<p>Contingent payment - Payments related to credit event settlement will be determined pursuant to the 2009 ISDA Credit Derivatives Determination Committees and Auction Settlement Supplement, (i.e., the Big Bang Protocol).</p> <p>Fixed Quarterly cash payments - reflected in basis points and paid by the protection buyer to the protection seller.</p> <p>Upfront fee payment - The upfront fee is a portion of the payments, expressed in percentage points of the notional, which is present valued and paid immediately to the seller.</p>
Trading Hours	00:01-24:00pm (ET), Sunday-Friday.
Block Size	As set forth in Appendix F to Part 43 of the Commission Regulations.
Speculative Limits	As set in Part 151 of the CFTC Regulations.
Reportable Levels	As set in the CFTC Regulation 15.03.

Exhibit C

GFI has determined that the CDS certified herein bear upon the following Core Principles:

Core Principle 2 – Compliance with Rules

Trading in CDS will be subject to the GFI Rulebook (the “Rules”), which prohibits abusive trading practices, including: acts detrimental to GFI (Rule 522) or that are inconsistent with just and equitable principles of trade (Rule 510), fraudulent acts (Rule 511), fictitious or non-competitive transactions (Rule 512), market manipulation (Rule 515), disruptive trading practices (Rule 516), misstatements (Rule 521), wash sales (Rule 531) and pre-negotiated or non-competitive trades, including money passes (Rule 533). Trading in these Swaps will also be subject to Rules relating to protection of customers. *See* Rules 525-528.

As with all Swaps listed for trading on the Trading Platform (as such terms are defined in the GFI Rulebook), trading activity in CDS will be subject to monitoring and surveillance by GFI’s Market Regulation Department. GFI has the authority to exercise its investigatory and enforcement power where potential Rule violations are identified. *See* Chapter 7 of the Rules.

Pursuant to Rule 601(a)(i), each CDS executed as a block trade must be for the quantity that is equal to or in excess of the applicable minimum block size for such CDS set forth in Commission Regulations.

Core Principle 3 – Swaps Not Readily Susceptible to Manipulation

With respect to a CDS, the value of payments made pursuant to the terms of this type of swap is determined primarily by reference to the applicable Index (the “Reference Price”). The Reference Price is not readily susceptible to manipulation because it has the following characteristics: (i) it is derived from a cash market that has considerable depth and liquidity resulting from the involvement of numerous institutional participants; (ii) the way in which the Reference Price is calculated is well documented and well understood by swap market participants; (iii) it is commonly used in the swap markets; (iv) information about the Reference Price is publicly and readily available; (v) if the Reference Price is based on an index, the index is administered and published by a reputable organization; and (vi) the most active participants in the relevant cash market are entities that are subject to regulation.

Core Principle 4 – Monitoring of Trading and Trade Processing

Chapter 5 of the Rules prohibits traders from manipulating, distorting the price of, and disrupting the cash settlement process of the Swaps. Such Rules are enforced by the Market Regulation Department.

Core Principle 5 – Ability to Obtain Information

Pursuant to the Rules, GFI will have the ability and authority to obtain sufficient information for each CDS to allow GFI to fully perform its operational, risk management, governance and regulatory functions and requirements under Part 37 of Commission Regulations.

Core Principle 6 – Position Limits or Accountability

Rule 536 allows GFI to adopt position accountability levels for Required Transactions. Persons with positions in excess of position accountability levels established by GFI will be required to provide, upon request by GFI, information about their positions in excess of the relevant position accountability threshold and consent to halt any further increases in those positions. GFI's Rules relating to position limits, position accountability levels and aggregation standards are provided below:

535. Position Limits; Exemptions

- (a) The Company may establish position limits for one or more Swaps, and grant exemptions from position limits, in accordance with CFTC Regulations. A Person seeking an exemption from position limits must apply to the Market Regulation Department in the form and manner required by the Company.
- (b) A Person intending to exceed position limits, including limits established pursuant to a previously approved exemption, must file the required application and receive approval from the Company prior to exceeding such limits. Notwithstanding the foregoing, a Person who establishes an exemption-eligible position in excess of position limits and files the required application with the Company shall not be in violation of this rule provided the filing occurs within one Business Day after assuming the position. In the event the positions in excess of the limits are not deemed to be exemption eligible, the applicant will be in violation of speculative limits for the period of time in which the excess positions remained open.
- (c) The Company shall, on the basis of the application and any requested supplemental information, determine whether an exemption from position limits shall be granted. The Company may approve, deny, condition or limit any exemption request based on factors deemed by the Company to be relevant, including, but not limited to, the applicant's business needs and financial status, as well as whether the positions can be established and liquidated in an orderly manner. A Person that has received an exemption from position limits pursuant to this Rule 535 shall be deemed to have agreed:
- (i) to comply with all terms, conditions or limitations imposed by the Company with respect to the exemption;
 - (ii) that the Company may modify or revoke the exemption at any time;
 - (iii) to initiate and liquidate positions in an orderly manner; and
 - (iv) to promptly submit a supplemental statement to the Company whenever there is a material change to the information provided in the most recent application.
- (d) A Participant shall not be in violation of this Rule if it carries positions for its Customers in excess of the applicable position limits for such reasonable period of time as the firm may require to discover and liquidate the excess positions. For the purposes

of this Rule, a reasonable period of time shall generally not exceed one Business Day. A Customer who exceeds the position limits as a result of maintaining positions at more than one Participant shall be deemed to have waived confidentiality regarding his positions and the identity of the Clearing Firm(s) at which they are maintained. A Participant carrying such positions shall not be in violation of this Rule if, upon notification by the Company, it liquidates its pro-rata share of the position in excess of the limits or otherwise ensures the Customer is in compliance with the limits within a reasonable period of time.

- (e) Nothing in this Rule 535 shall in any way limit:
 - (i) the authority of the Company to take emergency action; or
 - (ii) the authority of the Company to review at any time any position owned or controlled by any Person and to direct that such position be reduced to the applicable position limit.
- (f) A Person who has received written authorization from the Company for an exemption from position limits must annually file an updated application on or before the date that is one year following the approval date of the most recent application. Failure to file an updated application shall result in expiration of the exemption.
- (g) No Person shall exceed position limits that may be established by the Company or the CFTC, unless an exemption is granted by the Company. Any Person making a bid or offer that would, if accepted, cause such person to exceed the applicable position limits shall be in violation of this Rule.

536. Position Accountability

- (a) The Company shall establish position accountability levels for Required Transactions unless the Company has previously established position limits pursuant to Rule 535. A Person who holds or controls aggregate positions in excess of position accountability levels shall:
 - (i) provide, in a timely manner upon request by the Company, information regarding the nature of the position, trading strategy, and hedging information, if applicable;
 - (ii) be deemed to have consented, when so ordered by the Company, not to further increase the positions which exceed such position accountability levels; and
 - (iii) initiate and/or liquidate such positions in an orderly manner.
- (b) For purposes of this Rule 536, all positions in accounts for which a Person, by power of attorney or otherwise, directly or indirectly controls trading shall be included with the positions held by such Person. The provisions of this rule shall apply to positions held by two or more Persons acting pursuant to an expressed or implied agreement or understanding, the same as if the positions were held by or the trading of the positions was controlled by a single Person.

537. Aggregation of Positions

For purposes of Rule 535 and Rule 536, positions in Swaps shall be aggregated in accordance with CFTC Regulations.

Core Principle 7 – Financial Integrity of Transactions

All Swaps that are required to be cleared pursuant to Section 2(h) of the CEA or that are voluntarily cleared by the counterparties will be submitted for clearing through a DCO. *See* Rule 1002.

Core Principle 9 – Timely Publication of Trading Information

In accordance with Part 16 of Commission Regulations, GFI will publish daily market volume data reports for each Swap (or class of Swap) in terms of notional value. In addition, GFI will publish for each trading day, by tenor of the Swap, the opening price and the high and low prices. GFI will publish a settlement price for each such Swap except that, in the case of swaps listed for clearing by a DCO, the applicable settlement price will be the settlement price established by the DCO and GFI's website will contain a hyperlink to the relevant settlement information. *See* Rule 407.

GFI will submit electronic reports of all primary economic terms data for each Swap to a registered swap data repository immediately following execution of such Swap. *See* Rule 528. All such reports will meet the standards set out in Commission Regulation 45.3, including the requirement to produce a unique swap identifier for each transaction. GFI will also issue confirmations of transactions pursuant to Rule 525.