

CFTC Dodd-Frank Update

Final Rules & Guidance

- Agricultural Commodity Definition
- Agricultural Swaps
- Anti-manipulation
- Business Affiliate Marketing and Disposal of Consumer Information
- Commodity Pool Operators and Commodity Trading Advisors: Amendments to Compliance Obligations
- Derivatives Clearing Organization - General Provisions and Core Principles
- External Business Conduct Standards
- Foreign Boards of Trade - Registration
- Internal Business Conduct Standards (Duties, Recordkeeping, & CCOs)
- Investment Advisor Reporting on Form PF (Jt. with SEC)
- Investment of Customer Funds (Regulation 1.25)
- Large Trader Reporting for Physical Commodity Swaps
- Position Limits for Futures and Swaps
- Privacy of Consumer Financial Information
- Process for Review of Swaps for Mandatory Clearing
- Process for Rule Certifications for Registered Entities (Part 40)
- Real Time Reporting for Swaps
- Removal of References to or Reliance on Credit Ratings
- Reporting Certain Post-Enactment Swap Transactions (IFR)
- Reporting Pre-Enactment Swap Transactions (IFR)
- Retail Commodity Transactions – Interpretive Guidance on “Actual Delivery”
- Retail Foreign Exchange Intermediaries – Regulations & Registration
- Retail Foreign Exchange Transactions – Conforming Amendments
- Segregation for Cleared Swaps
- Swap Data Recordkeeping and Reporting Requirements
- Swap Data Repositories – Core Principles, Duties & Registration
- Swap Dealers and Major Swap Participants - Registration
- Whistleblowers

Proposed Rules & Guidance:

- Block Rule
- Capital for Swap Dealers & Major Swap Participants
- Client Clearing Documentation, Straight Through Processing, Clearing Member Risk Management
- Commodity Options
- Conforming Rules
- Designated Contract Markets – Core Principles
- Disruptive Trade Practices

- End-User Exception
- Entity Definitions (Jt. with SEC)
- Extraterritoriality
- Governance and Conflict of Interest (DCM, DCO, & SEF)
- Harmonization of CPO/CTA Reporting
- Identify Theft
- Implementation Phasing for Clearing & Trading Mandates
- Internal Business Conduct (Documentation, Confirmation, & Portfolio Reconciliation)
- Margin for Uncleared Swaps
- Process for “Made Available to Trade” Determinations
- Product Definitions (Jt. with SEC)
- Reporting of Historical Swaps
- Segregation for Uncleared Swaps
- Swap Execution Facilities – Core Principles & Registration
- Volcker Rule

Orders

Completed:

- Delegation to National Futures Association (NFA) – Certain exemptions for Commodity Pool Operators
- Delegation to NFA - Foreign Exchange Intermediary Registration function
- Delegation to NFA - Swap Dealer & MSP Registration function
- Exemptive orders – Effective Date for Swaps Regulation
- Treatment of Grandfather Relief Petitions - Exempt Boards of Trade & Exempt Commercial Markets
- Treatment of Grandfather Relief Petitions – Transactions done in Reliance on 2(h)

April & Later:

- Exemptive order - Municipal Public Power & Rural Electric Coops (201(f)’s)
- Exemptive order - Regional Transmission Organizations

Studies

Completed:

- Feasibility of Requiring Use of Standardized Algorithmic Descriptions for Financial Derivatives (Jt. with SEC)
- International Swap Regulation (Jt. with SEC)
- Study on Oversight of Carbon Markets (Jt. with various other Agencies)

May & Later:

- Position Limits – Effects of Implementation
- Stable Value Contracts (Jt. with SEC)