DTCC

FICC Treasury Clearing Client Roadmap

April 24, 2024

INTRODUCTION

This document is a preliminary roadmap to the changes FICC has proposed to address the SEC's U.S. Treasury clearing rules, and the timeline for actions that GSD Members will have to take to comply with those changes.

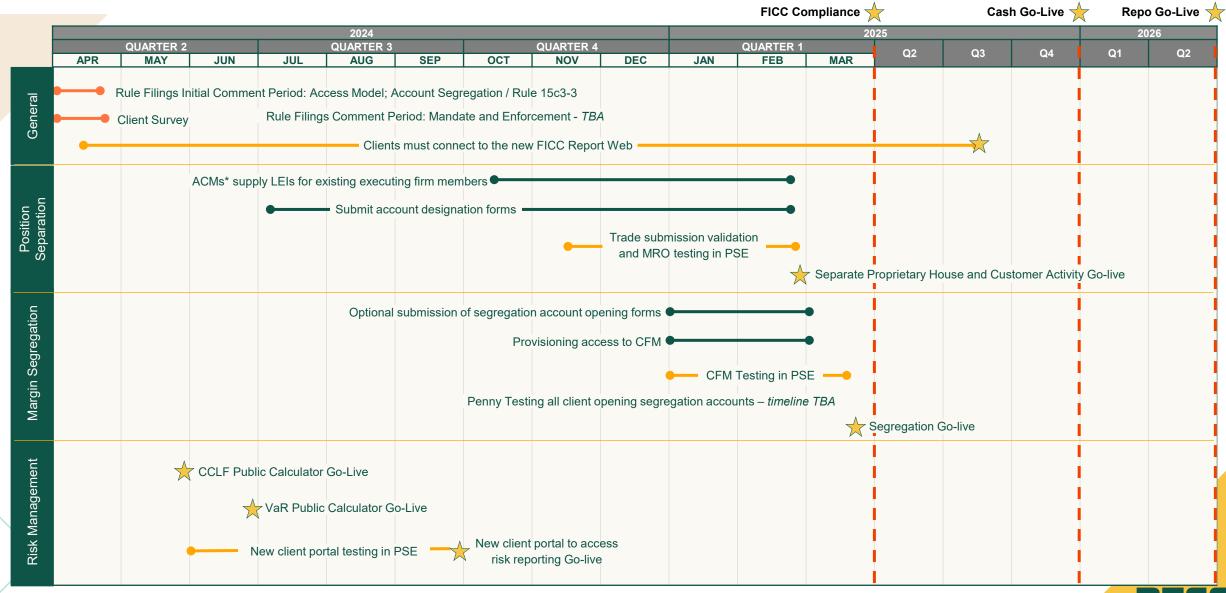
As the proposed changes are subject to regulatory review and approval, the information in this document may change.

FICC will continue to provide information on this topic through FICC Important Notices, though updates to this Roadmap and other documents on USTClearing.com.



TREASURY CLEARING CLIENT IMPACT ROADMAP





DETAILED CLIENT IMPACT VIEW – GENERAL

			Impacted Member Type					
Effort / Program	Description and Change	Netting Member	CCIT Member	Sponsoring Member	Agent Clearing Member	Sponsored Member	Executing Firm Customer	Current Stage
Rule Filings Comment Period	 Close of the initial public comment period for the Access Model and Account Segregation / Rule 15c3-3 rule filings – April 18, 2024 Deadline for FICC to submit the Mandate and Enforcement filing to the SEC: public comment period timeframe will be published after submission – June 14, 2024 	Optional	Optional	Optional	Optional	Optional	Optional	Pending SEC posting in the Federal Register
Client Survey	 DTCC's Fixed Income Clearing Corporation (FICC) requires this survey to refine the industry's understanding of the increased volumes of transactions required to be submitted for central clearing, and other implications of the Final Rule. This survey will be sent to organizations that include one or more legal entity that is a full netting member of the Government Securities Division (GSD) of FICC. Each legal entity (GSD Netting Member) must complete this survey Survey Deployed – April 2, 2024 Survey Close – April 29, 2024 	Required	Required	Required	N/A	N/A	N/A	Deployed
Clients must configure DNS to new FICC Report Center	 FICC Report Center Web has been modernized with a new authentication layer and will have a new URL. GSD Members will need to allow access to the new URL from their networks. This will require the new URL to be resolved (through Domain Name System or DNS configuration) over SMART/Radianz/SFTI network. FICC Integration team will help coordinate with the FICC network support teams to guide Members during transiting for network changes. GSD Members must configure their DNS to new FICC Report Center Q2 2024 – Q3 2025. 	Required	Required	Required	Required	N/A	N/A	Currently Available



DETAILED CLIENT IMPACT VIEW - POSITION SEPARATION

			Impacted Member Type					
Effort / Program	Description and Change	Netting Member	CCIT Member	Sponsoring Member	Agent Clearing Member	Sponsored Member	Executing Firm Customer	Current Stage
ACMs supply LEIs for existing Executing Firm Customers	 GSD Members who become Agent Clearing Members (including existing users of the PB and corresponding clearing services) will be required to submit LEIs for each of its Executing Firm Customers. Q4 2024 – Late February 2025 	N/A	N/A	N/A	Required	N/A	N/A	Pending Regulatory Approval
Submit Account Designation Forms	 Netting Members are required to separate proprietary (house) activity from customer activity, if applicable. Impacted Members will need to submit the necessary account forms to FICC. Forms will be accepted during Q3 2024 – Late February 2025 	If required to separate House and Customer activity	N/A	Optional	Optional	N/A	N/A	Pending Regulatory Approval
Trade Submission Validation Testing in PSE	 New trade submission validation code is being introduced that will check Agent Clearing Transactions for the inclusion of Executing Firm Customer data. Agent Clearing Transactions that do not include Executing Firm Customer data will be rejected from RTTM. PSE Testing for Agent Clearing Members required to separate their house and client activity. Beginning Mid Q4 2024 	If required to separate House and Customer activity	N/A	N/A	Required	N/A	N/A	Development
MRO Testing	 Testing of certain MROs related to Funds only Settlement (FOS). Beginning in December 2024 	Optional	Optional	N/A	Optional	N/A	N/A	Development
Separate Proprietary (House) and Customer Activity Go-Live	 Netting Members who currently submit proprietary (house) and customer activity through one account will be required to separate the activity into two accounts. Late February 2025 	If required to separate House and Customer activity	N/A	If required to separate House and Customer activity	to separate House and	N/A	N/A	Development

DETAILED CLIENT IMPACT VIEW - MARGIN SEGREGATION

					Impacted Member Type					
Effort / Program	Description and Change	Netting Member	CCIT Member	Sponsoring Member	Agent Clearing Member	Sponsored Member	Executing Firm Customer	Current Stage		
Optional Submission of Segregation Account Opening Forms	 Netting Members who are interested in opening a Segregated Customer Account will need to submit the necessary forms to open the account. Forms will be accepted starting in Q1 2025 	N/A	N/A	Optional	Optional	N/A	N/A	Pending Regulatory Approval		
Provisioning access to CFM	 All Netting Members will need to ensure they have access to the Clearing Fund Management (CFM) application and provision their users with appropriate access and accounts. This should be completed in conjunction with the account opening process. 	Required – both new and existing clients	Required - both new and existing clients	Required - both new and existing clients	Required - both new and existing clients	Required - both new and existing clients	Required - both new and existing clients	N/A		
CFM testing in PSE	 Members can perform UAT testing, focusing on changes to UI and reporting for segregated accounts beginning in January 2025. 	Optional	Optional	Optional	Optional	N/A	N/A	Development		
Penny testing All Clients Opening Segregation Accounts	GSD will open new cash and securities accounts for segregated margin collection. Transaction (penny) testing dates for Members opening Segregated Customer Accounts will be announced at a later date.	Optional	Optional	Optional	Optional	N/A	N/A	Analysis		
Segregation Go-Live	 Sponsoring Members and Agent Clearing Members will be able to collect and post to FICC margin for segregated customer activity. Beginning in March 2025 	N/A	N/A	Optional	Optional	N/A	N/A	Development		



DETAILED CLIENT IMPACT VIEW – RISK MANAGEMENT

					Impacted Member Type						
Effort / Program	· · · · · · · · · · · · · · · · · · ·	CCIT Member	Sponsoring Member	Agent Clearing Member	Sponsored Member	Executing Firm Customer	Current Stage				
Public Calculator – CCLF	 This tool will allow users to view simulated, potential CCLF obligations by taking user-defined data inputs and passing it through the existing GSD CCLF logic to provide an estimated individual CCLF obligation. Go Live – May 31, 2024 	Optional	Optional	Optional	Optional	Optional	Optional	Development			
Public Calculator – VaR	 The Value at Risk (VaR) charge represents the primary component of GSD's Clearing Fund requirement. The VaR Calculator is an open-source tool designed to provide transparency into GSD's risk management practices by allowing users the ability to create 'what-if' portfolios and project margin requirements. Go Live – June 28, 2024 	Optional	Optional	Optional	Optional	Optional	Optional	Development			
New Client Portal to Access Risk Reporting	 FICC is developing a new client portal to promote enhanced visibility into our risk management processes through time-series based risk reporting. This will enable Netting Members to gain insight into their Clearing Fund Requirement based reports as well as Intraday VaR Summary and CUSIP-level Detail reports. FICC will offer testing Netting Members that utilize FIR. Client Testing in PSE Begins: June 2024 Go-Live: September 30, 2024 	Optional	N/A	Optional	Optional	N/A	N/A	Development			



DETAILED CLIENT IMPACT VIEW – SEC MANDATED DATES

ĺ				Impacted Member Type					
	Effort / Program	Effort / Program Description and Change					Sponsored Member	Executing Firm Customer	
	Cash Go-Live	 December 31, 2025 - Deadline for Netting Members to begin submitting eligible Buy/Sell (cash) Transactions not already submitted to FICC. 	Required	N/A	Required	Required	N/A	N/A	
	Repo Go-Live	 June 30, 2026 - Deadline for Netting Members to begin submitting eligible Repo Transactions not already submitted to FICC. 	Required	N/A	Required	Required	N/A	N/A	



FOR MORE INFORMATION, PLEASE REACH OUT TO THE FOLLOWING:

- Current Members: contact your FICC Relationship Manager
- Onboarding and testing inquiries: <u>FICCIntegration@dtcc.com</u>
- Buyside/Non-Member inquiries: <u>buysiderm@dtcc.com</u>
- All other Treasury Clearing inquiries: https://www.dtcc.com/ustclearing/contact-us

