

MEMO# 31201

May 7, 2018

Member Calls on May 14 and 30 to Discuss Rule 4.5 Reform

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May 7, 2018 TO: Registered Fund CPO Advisory Committee RE: Member Calls on May 14 and 30 to Discuss Rule 4.5 Reform

During a committee call in mid-April, we discussed ICI's intention to develop proposals for Rule 4.5 reform. Based on our discussions with CFTC Chairman Giancarlo, Commissioner Behnam and staff of the Division of Swap Dealer and Intermediary Oversight, as well as public statements by Chairman Giancarlo and Commissioners Behnam and Quintenz, there appears to be a good opportunity to work with the agency to rationalize its regulation of registered fund CPOs and CTAs. On that call, we discussed the formation of an ICI working group to pursue this effort.

We have since decided to take a slightly different approach to this work. At least as an initial matter, we will work on these issues through the CPO Committee as a whole, rather than form a separate working group.

The Committee will hold two conference calls in May: **Monday, May 14 from 3-4 pm ET** and **Wednesday, May 30 from 2-3 pm ET**. The focus for both calls will be to identify the issues of most concern to members, which will help ICI develop a work plan for advancing this effort. ICI also has engaged outside counsel for this project.

You will receive Outlook appointments for both calls. If you plan to participate, please accept the appointment(s) as this will help us in reserving enough phone lines for the calls.

Attached for your review is an initial list of issues that could be addressed in the context of Rule 4.5 reform. We will discuss this list on the May 14 committee call.

If you have any questions or concerns, please do not hesitate to contact me or Sarah Bessin. We look forward to working with you.

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Associate General Counsel

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