

MEMO# 28417

September 30, 2014

Draft ICI Global Comment Letter in Response to IOSCO's Proposed Risk Mitigation Standards for Non-centrally Cleared OTC Derivatives; Member Feedback Requested by Thursday, October 9

[28417]

September 30, 2014

TO: DERIVATIVES MARKETS ADVISORY COMMITTEE No. 63-14
ICI GLOBAL MEMBERS No. 36-14
INTERNATIONAL COMMITTEE No. 30-14 RE: DRAFT ICI GLOBAL COMMENT LETTER IN RESPONSE TO IOSCO'S PROPOSED RISK MITIGATION STANDARDS FOR NON-CENTRALLY CLEARED OTC DERIVATIVES; MEMBER FEEDBACK REQUESTED BY THURSDAY, OCTOBER 9

On September 17, 2014, the Board of the International Organization of Securities Commissions ("IOSCO") issued its initial policy proposals to establish risk mitigation standards for non-centrally cleared OTC derivatives. [\[1\]](#) We have prepared a draft comment letter in response to the Consultation Report, which is attached. The draft letter generally agrees that the risk mitigation techniques described in the Consultation Report could help reduce risks to counterparties engaged in OTC derivatives transactions, the OTC derivatives markets, and the financial markets more generally. The letter recommends, however, that IOSCO give further consideration to implementation, cross-border, and certain other issues.

If you have comments on the draft letter, please provide them to Jennifer Choi at jennifer.choi@ici.org by Thursday, October 9.

Jennifer S. Choi
Senior Associate Counsel Securities Regulation

[Attachment](#)

endnotes

[1] Risk Mitigation Standards for Non-centrally Cleared OTC Derivatives, IOSCO (Sept. 2014), available at <http://www.iosco.org/library/pubdocs/pdf/IOSCOPD450.pdf> (“Consultation Report”). For a summary of the Consultation Report, see ICI’s Memorandum No. 28378 (Sept. 18, 2014), available at http://www.ici.org/my_ici/memorandum/memo28378.

Copyright © by the Investment Company Institute. All rights reserved. Information may be abridged and therefore incomplete. Communications from the Institute do not constitute, and should not be considered a substitute for, legal advice.