MEMO# 31458

October 26, 2018

ICI and Other Trade Associations Request That SEC Re-Propose and Extend Comment Deadline of Security-Based Swaps Release

[31458]

October 26, 2018 TO: ICI Members
ICI Global Members
Derivatives Markets Advisory Committee
ICI Global Trading & Markets Committee SUBJECTS: Derivatives
International/Global
Investment Advisers
Trading and Markets RE: ICI and Other Trade Associations Request That SEC Re-Propose and Extend Comment Deadline of Security-Based Swaps Release

Recently, ICI, along with the International Swaps and Derivatives Association, Inc., Managed Funds Association and the US Chamber of Commerce, Center for Capital Markets Competitiveness (collectively, "Associations") filed the attached letter with the SEC. Our letter requests that the SEC re-propose, and extend the comment deadline of, the Commission's proposal on Capital, Margin, and Segregation Requirements for Security-Based Swap Dealers and Major Security-Based Swap Participants, which recently was re-opened for comment.

As noted in the letter, the Associations represent sell side and buy side market participants, as well as key market intermediaries. We anticipate that we may have different comments from one another on the issues raised in the reopened proposal. We agree, however, that the comment process would be materially assisted by both a re-proposal and a longer comment period (the Associations request that the SEC extend the comment deadline for an additional 30 days to December 19, 2018) in order to provide the opportunity for thoughtful public feedback on this important rulemaking.

Sarah A. Bessin
Associate General Counsel

George M. Gilbert
Assistant General Counsel

[Attachment](#)