

MEMO# 34153

May 19, 2022

ICI Files Supplemental Comment Letter to SEC on Large Security-Based Swap Position Reporting Proposal

[34153]

May 20, 2022

TO: ICI Members

Derivatives Markets Advisory Committee

Equity Markets Advisory Committee SUBJECTS: Derivatives

Trading and Markets RE: ICI Files Supplemental Comment Letter to SEC on Large Security-Based Swap Position Reporting Proposal

ICI has filed the attached supplemental comment letter with the SEC on its large security-based swap ("SB swap") position reporting proposal. This letter further addresses proposed Rule 10B-1, which would require any person with an SB swap position of a certain size, based on specified calculations, to file a Schedule 10B on a T+1 basis that publicly discloses information related to the position.

ICI had filed an initial comment letter that strongly opposed the T+1 reporting and public dissemination timeframe,[\[1\]](#) but had not yet provided an alternative recommendation due to its ongoing assessment of the SEC's other recent reporting proposals in tandem with this proposal. In the attached letter, ICI now recommends that the SEC amend the proposed rule to require a Schedule 10B to be filed within 45 days after the end of a calendar quarter as of which a SB swap position exceeds an applicable reporting threshold.

Nhan Nguyen
Assistant General Counsel, Securities Regulation

endnotes

[1] ICI Memorandum No. 34083 (March 22, 2022), available at <https://www.ici.org/memo34083>.

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