

COMMENT LETTER

October 12, 2023

ICI Comment Letter on Margin Requirements for Uncleared Swaps for Swap Dealers and Major Swap Participants

On October 10, ICI filed a comment letter with the CFTC on its proposed amendments to margin requirements for uncleared swaps related to the treatment of seeded funds and eligibility of certain money market funds (MMFs) as eligible collateral.

The letter expresses support for providing that a seeded fund meeting with certain specified conditions would be deemed not to have any margin affiliates for purposes of calculating a fund's material swaps exposure and the IM threshold amount, for a period of three years from the fund's trading inception date.

Read more in the [comment letter](#).