

VIA CFTC PORTAL

15 July 2019

Mr Christopher Kirkpatrick
Commodity Futures Trading Commission
115 21st Street NW
Three Lafayette Centre
Washington DC 20581

LCH Limited Self-Certification: Listed Rates fee discount

Dear Mr Kirkpatrick,

Pursuant to Commodity Futures Trading Commission (the "CFTC") Regulation §40.6(a), LCH Limited ("LCH"), a derivatives clearing organization registered with the CFTC, is submitting for self-certification a fee discount for Approved Proprietary Trading Firms (PT) in Listed Rates.

Part I: Explanation and Analysis

LCH clears interest rate futures contracts on behalf of CurveGlobal Markets (a registered Foreign Board of Trade (FBOT)), the derivatives trading venue operated by the London Stock Exchange Group. For PT firms the fee is 50% of the standard Headline Tariff. This applies to both trading and clearing fees. Since go-live a rolling 12 month volume based incentive plan for PTs has existed which allowed for no fees over certain volume thresholds (100,000 lots per calendar month). This PT incentive scheme expired on 30 June 2019.

LCH is now proposing to offer a 50% discount on PT clearing fees across all live contracts irrespective of volume. LCH proposes the scheme to start on 1 August 2019 and run until 30 June 2020 (11 months).

Part II: Description of Rule Changes

There are no changes to the LCH Rulebook, however LCH will make changes to its website to highlight the new fee discount as shown in **Appendix I**.

Part III: Core Principle Compliance

LCH has reviewed the changes against the requirements of the Core Principles and finds that they will continue to comply with all the requirements and standards therein.

Part IV: Public Information

LCH has posted a notice of pending certification with the CFTC and a copy of the submission on LCH's website at:

<http://www.lch.com/rules-regulations/proposed-rules-changes>

Part V: Opposing Views

There were no opposing views expressed to LCH by governing board or committee members, members of LCH or market participants that were not incorporated into the change.

Certification

LCH hereby certifies to the Commodity Futures Trading Commission, pursuant to the procedures set forth in Commission Regulation § 40.6, that the attached submission complies with the Commodity Exchange Act, as amended, and the regulations promulgated there under.

Should you have any questions please contact me at julian.oliver@lch.com.

Yours sincerely

P.P. Oliver

Julian Oliver
Chief Compliance Officer
LCH Limited

Appendix I

Website changes (Fees webpage)

<https://www.lch.com/services/listed-rates/fees>

The below tariff is effective 1 August 2019

Approved Proprietary Trading Firms	
Product	Fee
Euro	0.035
Sterling	0.035

A fee-based discount plan for discount Approved Proprietary Trading Firms will apply.

For cleared volumes, a 50% discount will be applied to the existing tariff. This discount plan will apply until 30 June 2020.