Joint Audit Committee

REGULATORY UPDATE

TO: Chief Financial Officers #09-09

Chief Compliance Officers

DATE: November 17, 2009

SUBJECT: Revised Margin Deposit Acceptability by Exchange Exhibit

The Joint Audit Committee has updated the "Margin Deposits Acceptability by Exchange" exhibit to reflect certain clarifications and changes in exchange rules. Please refer to the individual exchange rules on the chart for specific requirements.

The attached exhibit only reflects exchange rules pertaining to acceptable margin deposits from customers and noncustomers to firms (customer to firm level). Acceptable margin collateral at clearing organizations may differ. For acceptable margin collateral and their valuation at clearing organizations (firm to clearing organization level), please consult the rules of the individual clearing organizations.

If you have any questions, please consult your DSRO.

MARGIN DEPOSITS ACCEPTABILITY BY EXCHANGE

November 2009

Exchange/ Division	Rule	Foreign Currencies	U.S. Gov't Obligations	U.S. Gov't Agencies	Municipal Bonds	Equity Securities	U.S. Deliverable Warehouse Receipts	Irrevocable Letters of Credit	Loans	Other
<u>CCFE</u>	CCFE 520	YES	YES	YES	YES	YES	NO	YES	NO	Any Readily Marketable Security, MMMF (1)
<u>CFE</u>	CFE 516(d)	YES	YES	YES	YES	YES	NO	YES	YES (If Secured); See Rule 516(j)	Any Readily Marketable Security, MMMF (1)
CME Group Inc.	CBOT 930.C	YES	YES	YES	YES	YES	YES (CBOT products only)	YES	YES (If Secured)	Any Readily Marketable Security, MMMF (1), Gold(6)
СМЕ	CME 930.C.	YES	YES	YES	YES	YES	NO	YES	YES (If Secured)	Any Readily Marketable Security, MMMF (1), Gold(6)
COMEX	NYMEX 930.C	YES	YES	YES	YES	YES	YES (NYMEX/COMEX products only)(2)	YES	YES (If Secured)	Any Readily Marketable Security, MMMF (1), Gold(6)
NYMEX	NYMEX 930.C	YES	YES	YES	YES	YES	YES (NYMEX/COMEX products only)(2)	YES	YES (If Secured)	Any Readily Marketable Security, MMMF (1), Gold(6)
ELX	ELX V-8(f)	YES	YES	YES	YES	YES	NO	YES	YES (If Secured); See Rule V-8(e)	Any Readily Marketable Security, MMMF (1) (7)
<u>ICE</u>	ICE 5.03	YES	YES	YES	YES	YES (4)	YES (5)	YES	YES (If Secured)	Any Readily Marketable Security, MMMF (1)
KCBOT	KCBOT 1160.01	NO	YES	NO	NO	YES (3)	NO	YES	NO	NO
MGEX	MGEX 760	YES	YES	YES	YES	YES	YES (Wheat, Corn and Soybeans only)	YES	YES (If Secured)	NO
<u>NFX</u>	NFX E11(d) & F11(d)	YES	YES	YES	YES	YES	NO	YES	NO	Any Readily Marketable Security, MMMF (1)
NYSE Liffe US	NYSE Liffe US 521	YES	YES	YES	YES	YES	YES	YES	YES (If Secured)	Any Readily Marketable Security, MMMF (1) (7)
<u>OneChicago</u>	OneChicago 515(d)	YES	YES	YES	YES	YES	NO	NO	YES (If Secured); See Rule 515(h)	MMMF(1), Margin Securities as defined by Regulation T

All exchanges accept U.S. dollars. For all acceptable margin deposits, specific requirements, and their respective valuation/haircuts, refer to the individual exchange rules noted above.

⁽¹⁾ Money Market Mutual Funds (MMMF) are acceptable under CFTC 1.25 for futures and options on futures contracts and under CFTC 41.46(b)(2) for security futures products.

^{(2) 75%} of market value

^{(3) 70%} of market value for stocks listed in the Value Line Index, on NYSE, and OTC Margin Stock as defined by Federal Reserve System Regulation G Section 207.2(k).

^{(4) 75%} of market value for stocks listed on NYSE or NASDAQ.

^{(5) 70%} of settlement value for electronic WHR covering Coffee "C", Cocoa, Cotton, and FCOJ.

⁽⁶⁾ Allocated "London Good Delivery" gold as defined by the London Bullion Market Association

⁽⁷⁾ As the indicated Exchange's products are cleared by the Options Clearing Corp, please also refer to OCC Rule 604.