

Joint Audit Committee

REGULATORY ALERT

TO: Chief Executive Officers
Chief Financial Officers
Chief Compliance Officers

#14-05

DATE: July 1, 2014

SUBJECT: CFTC Regulation 1.11(c)(4) – Risk Management Program Submission

As part of the Commodity Futures Trading Commission's ("CFTC") recently adopted enhanced customer protections, CFTC Regulation 1.11(c) requires FCMs to establish, maintain, and enforce a system of risk management policies and procedures designed to monitor and manage the risks associated with the activities of the FCM. Such policies and procedures comprise the FCM's Risk Management Program.

Under CFTC Regulation 1.11(c)(4) FCMs must submit their risk management policies and procedures to the CFTC and their designated self-regulatory organization ("DSRO") upon request.

The attached letter from the CFTC's Division of Swap Dealer and Intermediary Oversight dated June 30, 2014 serves as a request under CFTC Regulation 1.11(c)(4) to all FCMs to file their risk management policies and procedures on or before July 14, 2014 with the CFTC and with their respective DSRO through WinJammer™. The Risk Management Program filed through WinJammer would only be transmitted to the CFTC and the FCM's DSRO.

If you have any questions, please contact your DSRO.



U.S. COMMODITY FUTURES TRADING COMMISSION

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**Division of Swap Dealer and
Intermediary Oversight**

June 30, 2014

Barbara Wierzynski
Futures Industry Association
1200 Pennsylvania Avenue, NW
Suite 600
Washington, DC 20006-1823

Dear Ms. Wierzynski:

Based on our prior communications and conversations, I understand that there is uncertainty with respect to the timing of a futures commission merchant's ("FCM") filing obligations under Commodity Futures Trading Commission Regulation 1.11 because Regulation 1.11(c)(4) states that an FCM must submit the risk management policies and procedures "upon request."

This letter is intended to address the uncertainty by serving as a request under Regulation 1.11(c)(4) to submit such policies and procedures on or before July 14, 2014. The submissions should be made electronically through WinJammer™ with the Commission and with the FCM's designated self-regulatory organization. If you have further questions, please do not hesitate to contact me at 202-418-5977.

Sincerely,

Gary Barnett
Director