

# KEY DATES FOR CERTAIN CFTC REGULATIONS AFFECTED BY JOINT CFTC-SEC PRODUCT DEFINITION RULES

## Recordkeeping, Reporting, Conflicts of Interest; Chief Compliance Officer

Compliance date for FCMs registered with the CFTC on June 4, 2012, and currently regulated by a prudential regulator or SEC for Chief Compliance Officer provisions. Compliance date for SDs and MSPs currently regulated by a prudential regulator or SEC for business continuity, disaster recovery, and Chief Compliance Officer provisions. Compliance date for SDs and MSPs not currently regulated by a prudential regulator or SEC for recordkeeping, reporting limits, and risk management.  
77 FR 20128

## Recordkeeping, Reporting, Conflicts of Interest; Chief Compliance Officer

Compliance date for SDs and MSPs not currently regulated by a prudential regulator or SEC for business continuity and disaster recovery.  
77 FR 20128

### KEY

<b>AUM</b>	Assets Under Management
<b>CFTC</b>	Commodity Futures Trading Commission
<b>CPO</b>	Commodity Pool Operator
<b>CTA</b>	Commodity Trading Advisor
<b>DCM</b>	Designated Contract Market
<b>DCO</b>	Derivatives Clearing Organization
<b>ECP</b>	Eligible Contract Participant
<b>FCM</b>	Futures Commission Merchant
<b>IB</b>	Introducing Broker
<b>MSBSP</b>	Major Security-Based Swap Participant
<b>MSP</b>	Major Swap Participant
<b>SBSD</b>	Security-Based Swap Dealer
<b>SD</b>	Swap Dealer
<b>SDR</b>	Swap Data Repository
<b>SEC</b>	Securities and Exchange Commission
<b>SEF</b>	Swap Execution Facility

SEPTEMBER 30

DECEMBER 29

2012

2013

SEPTEMBER 15

OCTOBER 14

DECEMBER 14

DECEMBER 31

MARCH 29

**CPOs and CTAs: Compliance Obligations**  
CPOs with at least \$5 billion commodity pool AUM must report on Form CPO-PQR. CPO-PQR reports are due on November 29, 2012.  
77 FR 11252

**Business Conduct Standards for SDs and MSPs**  
Compliance date.  
77 FR 9734

**CPOs and CTAs: Compliance Obligations**  
All CPOs must report on Form CPO-PQR; all CTAs must report on Form CTA-PR. CTA-PR reports are due on February 14, 2013 and CPO-PQR reports are due on March 1, 2013 or March 29, 2013 depending on commodity pool AUM.  
77 FR 11252

**CPOs and CTAs: Compliance Obligations**  
Compliance date for all remaining provisions of rule.  
77 FR 11252

**Recordkeeping, Reporting, Conflicts of Interest; Chief Compliance Officer**  
Compliance date for SDs and MSPs not currently regulated by a prudential regulator or SEC for Chief Compliance Officer provisions. Compliance date for FCMs registered with the CFTC on June 4, 2012, and not currently regulated by a prudential regulator or SEC for Chief Compliance Officer provisions.  
77 FR 20128

This summary is for convenience only and is not intended to be complete or authoritative. It assumes prompt publication of the final products definition rules in the Federal Register. It takes into account only published, final rules in effect on the date hereof (other than the product definition rules, which have yet to be published) and does not reflect any proposed rules or orders. It also does not reflect the SEC's proposed timeline on the sequencing of compliance dates for security-based swap rules. Do not rely on this document. For legal advice, please contact your usual Goodwin Procter contact.

# KEY DATES FOR CERTAIN CFTC REGULATIONS AFFECTED BY JOINT CFTC-SEC PRODUCT DEFINITION RULES

Dates based on the date on which the product definition rules are published in the Federal Register (for example, “T + 60” means “60 days after publication”).

T + 60	T + 150	T + 240																																
<p><b>Recordkeeping, Reporting, Conflicts of Interest; Chief Compliance Officer</b> Compliance date for SDs and MSPs for monitoring of position limits, diligent supervision, conflicts of interest, general information, and antitrust. Compliance date for SDs and MSPs for recordkeeping, reporting limits, and risk management; applies if currently regulated by a prudential regulator or SEC. FCMs must comply with clearing activities provisions. 77 FR 20128</p> <p><b>Swap Data Repositories: Registration Standards, Duties and Core Principles</b> Mandatory registration and compliance with registration rules is required. 76 FR 54538</p> <p><b>Registration of SDs and MSPs</b> SDs and MSPs must register. 77 FR 2613</p> <p><b>Position Limits for Futures and Swaps</b> Compliance date for spot-month limits and non-spot-month legacy limits. 76 FR 71626</p> <p><b>Commodity Options</b> Compliance date. 77 FR 25320</p>	<p><b>Real-Time Public Reporting of Swap Transaction Data</b> Compliance date for SEFs, DCMs, SDRs, SDs, and MSPs with respect to credit swaps and interest rate swaps. 77 FR 1182</p> <p><b>Swap Data Recordkeeping and Reporting Requirements</b> Compliance date for SEFs, DCMs, DCOs, SDRs, SDs, and MSPs with respect to credit swaps and interest rate swaps. 77 FR 2136</p> <p><b>Swap Data Recordkeeping and Reporting Requirements: Pre-Enactment and Transition Swaps</b> Compliance date for SDs and MSPs with respect to credit swaps and interest rate swaps. 77 FR 35200</p>	<p><b>Real-Time Public Reporting of Swap Transaction Data</b> Compliance date for SEFs, DCMs, SDRs, SDs, and MSPs with respect to equity, foreign exchange, and “other commodity” asset classes. 77 FR 1182</p> <p><b>Swap Data Recordkeeping and Reporting Requirements</b> Compliance date for counterparties that are not SDs or MSPs. 77 FR 2136</p> <p><b>Swap Data Recordkeeping and Reporting Requirements: Pre-Enactment and Transition Swaps</b> Compliance date for counterparties that are not SDs or MSPs. 77 FR 35200</p>																																
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