Business Requirements Document

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| Initiative: | Global Trade Repository  Canadian Requirements |
|  | OTC Derivatives |

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The Ontario Securities Commission (the "OSC"), the Autorité des marchés financiers (“AMF”) and the Manitoba Securities Commission (the “MSC”) have not approved or otherwise sanctioned the information contained in this document. The business requirements detailed herein represent the DTCC GTR proposed implementation of trade reporting to enable firms to comply with OSC, AMF and MSC regulations. Readers should not infer approval by the OSC, AMF or the MSC of the content of this document.

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# Project Summary

## Project Scope

Canadian derivatives reporting is regulated at the provincial level. Federal regulations have not yet been enacted. Each province or territory has a separate regulator. Currently only three provinces have laws in place to regulate derivatives, these are Ontario, Quebec and Manitoba. Other Provinces and Territories are currently working to pass legislation that will allow derivatives regulation.

The Provinces and Territories have worked together through the Canadian Securities Administrators (“CSA”) group to coordinate the creation of the Canadian Model rules for derivatives reporting. The CSA has no authority, but rather is an organization through which the various provinces coordinate reporting requirements and activities, including enforcement actions. The model rules are meant to be adopted in their final form by each Province and Territory so that derivatives regulations are significantly similar and are thus “standardized” across all provinces and territories. Ontario, Quebec and Manitoba based their regulations on the Canadian Model Rules.

The DTCC Global Trade Repository (the “GTR”) will be enhanced to enable market participants to comply with trade reporting requirements as defined by the rules of each specific province for which DTCC offers trade repository services. This Business Requirements Document (BRD) will focus on the requirements to enable reporting of Over-The-Counter (“OTC”) trades in specific provinces. Where possible this project will build upon the existing core GTR functionality and design principles.

The derivative asset classes reportable under each of the provinces include Credit, Commodities, Equity, FX and Interest Rates derivatives. The data fields to be reported and the manner of reporting are a combination of Dodd-Frank and EMIR requirements and include a few new fields. The reporting requirements are for OTC trades and exclude exchange traded transactions, physical commodities transactions and spot FX transactions that are not rolled and where the currency is exchanged.

The reporting is single sided with the reporting counterparty set out by the regulations. However, in certain situations the regulations contemplate that both counterparties report the transaction. Dual sided reporting is set as the backstop and the regulators have made clear in the Companion Policy to the Reporting Counterparty section that their intention is for only one side to report, i.e. the counterparties agree as to which counterparty reports the transaction. The newest regulations allow parties to use the ISDA Reporting party methodology to eliminate the dual reporting situations. However, if a party does not elect the ISDA methodology, dual reporting may still be required. If both sides on a dually submitted trade report to DTCC and use the same UTI, then the sides will be reported together and the position will show each side as a separate line item. But, if the parties report one side to DTCC and the other side to another repository or if both sides are reported to DTCC, but have different UTIs, then there will be no reconciliation and the overall reporting to the regulator will be increased by one trade incorrectly. The regulators understand these scenarios and have agreed with the process as it stands.

The rules require the reporting of Creation data, the full set of fields required to be reported, real time or as soon as technically practicable (“ASATP”), but in no event, not later than the end of the following business day for the Reporting Counterparty (***Note; this is not related to real time public dissemination as required under the DFA***).

Details of life-cycle events resulting in a change to the reported fields are required to be reported throughout the life of a derivative contract for all asset classes. All reporting of life cycle events is to occur on the close of business on the day the life cycle event occurs, but if not possible the life cycle event should be reported no later than the business day following the day a life cycle event occurs. Life cycle events may be reported as they occur or each event provided separately in a batch file at the end of the day they are required to be reported (Note that this requires a submission for each individual event and is different than the DFA requirements).

Valuation Data is required to be reported based on industry accepted valuation standards and must be reported daily if the reporting counterparty is a derivatives dealer or a recognized or exempt clearing agency and must be reported quarterly, as of the last day of each calendar quarter, within 30 days of the end of the calendar quarter if the reporting counterparty is not a derivatives dealer or a recognized or exempt clearing agency.

The scope of historical trade data reporting for Derivatives Dealers and recognized or exempt clearing agencies is limited to pre-existing transactions that were entered into prior to October 31, 2014 and that had outstanding contractual obligations on that day and are still live after April 30, 2015. Pre-existing transactions are required to be reported no later than April 30, 2015 and life cycle and valuation reporting does not need to start until they are reported as pre-existing transactions. Historical trade data reporting for all others is limited to pre-existing transactions that were entered into prior to June 30, 2015 and that had outstanding contractual obligations on that day and are still live after December 31, 2015. Pre-existing transactions for all others are required to be reported no later than December 31, 2015 and life cycle and valuation reporting does not need to start until they are reported as pre-existing transactions. Specific fields within the larger set of creation data fields are required to be reported as detailed in Appendix A to regulation 91-507 for all entities.

Public dissemination of transaction level data must be provided beginning April 30, 2015 for derivatives dealers and recognized or exempt clearing agencies. Dates for public dissemination of transaction level data by all others will start on June 30, 2015, the first day of reporting. Specific fields within the larger set of creation data fields are required to be reported as detailed in Appendix A to regulation 91-507.

The Following features will be made available in DDR for Canadian Reporting:

1. Addition of each province as a valid jurisdiction for reporting trades to the GTR, for example, Ontario = “CA.ON.OSC”, Quebec = “CA.QC.AMF” and Manitoba = “CA.MB.MSC”. Provisions should also be made for additional provinces that go live in the future.

2. Reuse of international jurisdiction templates, products, and processes for Canadian reporting:

a. Same trade data templates as currently reported by firms.

b. Same trade reporting processes leading to an ‘end-of-day’ position for the trade.

3. Reporting to Provincial Canadian Regulators on T+1 basis

4. Creation of regulator reports for each Province.

5. Creation of a clone of current participant reporting to detail trades reported to the Provinces.

6. Enhance existing GTR systems to allow for participant election of the “Canadian” reporting service.

## Key Compliance Dates

1. Reporting by Derivatives Dealers and recognized or exempt clearing agencies for all asset classes starts on October 31, 2014.
2. Reporting by all other Reporting Parties starts on June 30, 2015.
3. Pre-existing trades for Derivatives Dealers and recognized or exempt clearing agencies, those trades entered prior to October 31, 2014 and still live on April 30, 2015 must be reported by April 30, 2015.
4. Pre-existing trades for all others, those trades entered prior to June 30, 2015 and still live on December 31, 2015 must be reported by December 31, 2015.
5. Transaction level Public price dissemination will commence on April 30, 2015 for Derivatives Dealers and recognized or exempt clearing agencies and on June 30, 2015 for all others.

## Definitions

1. **Derivatives Dealer** - means a person or company engaging in or holding himself, herself or itself out as engaging in the business of trading in derivatives in Ontario or Manitoba as principal or agent;
2. **Local Counterparty** - means a counterparty to a transaction if, at the time of the transaction, one or more of the following apply:

(a) the counterparty is a person or company, other than an individual, organized under the laws of Ontario or that has its head office or principal place of business in Ontario;

(b) the counterparty is registered under Ontario securities law as a derivatives dealer or in an alternative category as a consequence of trading in derivatives;

(c) the counterparty is an affiliate of a person or company described in paragraph (a), and such person or company is responsible for the liabilities of that affiliated party;

1. **Participant** - means a person or company that has entered into an agreement with a designated trade repository to access the services of the designated trade repository;
2. **Reporting Counterparty** - means the counterparty to a transaction as determined under the regulations that is required to report derivatives data.

## Assumptions

1. The use of “Canadian” refers to one or more provinces for which DTCC is a TR.
2. The service offering will be from the DDR entity.
3. Processing and report output will be conducted out of the U.S. Data Center for local processing via DDR.
4. Each Province will determine the nexus of trades that will be reportable. The GTR will not determine if a trade is reportable to a particular Province – this will remain the sole responsibility of the reporting parties through the use of the reporting obligation field.
5. Only trades that have been invoked with ‘CA.ON.OSC’, ‘CA.QC.AMF’ and/or ‘CA.MB.MSC’ enumerated value(s) in the Reporting Obligation field are eligible for Canadian reporting.
6. The Canadian reporting service is open for 3rd party submitters (e.g. MarkitSERV, etc.)
7. When reporting a trade to multiple regulators via the GTR system, details of other regulators will be masked. For example if Firm A reports a trade to both OSC and CFTC, OSC and CFTC will not know that the trade was dually submitted for CFTC and OSC.

# Business Requirements Inventory

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| --- | --- | --- | --- |
| **Requirement**  **Number** | **Requirement Name** | **Ranking**   * **Critical** * **High Priority** * **Medium Priority** * **Low Priority** |  |
| BR-1 | Interfaces – In-bound message specifications | Critical |  |
| BR-2 | Validations | Critical |  |
| BR-3 | Unique Transaction Identifiers | Critical |  |
| BR-4 | Reporting | Critical |  |
| BR-5 | Jurisdiction | Critical |  |
| BR-6 | SDO | Critical |  |
| BR-7 | Central Counterparties (CCP) | Critical |  |
| BR-8 | Billing | Critical |  |
| BR-9 | Data Staging | Medium Priority |  |
| BR-10 | DTCC Build Phases and Dates | Critical |  |

## BR-1 - Interfaces – In-bound message specifications

### Overview

Canadian Model Rules require the reporting of Creation, life cycle, valuation and transaction level public dissemination. The GTR will provide all current message types for use for Canadian reporting, to include Real time, PET, Confirmation, snapshot, valuation verification and document messages.

### Messages

**2.1.2.1 Message Types**

The existing GTR trade reporting templates, products, and trade reporting processes currently in use for global reporting will remain unchanged for Canadian reporting.

Real Time – The Real Time message will be required for transaction level public dissemination under the Canadian regulations. Submission of a Real Time message to the GTR with a Canadian reporting obligation will signify to the DDR that the submission was price forming and should be listed on the appropriate end of day slice file which will then be posted to the Canadian section of the public website. Submissions that do not have a DFA requirement, i.e. are Canada only, can be made up to T+1. Thus the timing requirement of the Canadian only Real Time message will be dependent on the underlying submission timing requirement as determined by the participant. The real time message will be posted to the Canadian ticker T+1 or T+2 after receipt depending on the status of the reporting counterparty. The Transaction level public price reporting requirement does not start until April 30, 2015 for Derivatives Dealers and recognized or exempt clearing agencies and June 30, 2015 for all others. Until the requirement starts, Real Time messages sent with Canadian Provincial reporting obligations will not be used for reporting purposes, however, the messages will not be rejected either if firms want to time their builds to an earlier date. Please note that the Real Time Message can only be used for transaction level public dissemination, it cannot be used to open or modify a position and must always be used in conjunction with a PET, Confirmation or Snapshot message.

Real Time – Pet - See details under Real Time above and PET below

Real Time – Pet – Confirmation – See details under Real Time above and PET below

PET – The PET message will be available for Canadian reporting. While there is no requirement for a PET message under the Canadian regulations, the timing required by the regulations for provision of creation data will require firms to use either the PET message or Snapshot message to report creation data. The PET message contains all of the fields required under the regulations for every asset class.

PET – Confirmation – See details under PET above

Confirmation – Firms are able to send the confirmation message for Canadian reporting. The message type is not required and all specified fields can be provided in the PET or Snapshot messages, however, if the Confirmation message is used, the additional data provided within the Confirmation message will be provided to the regulators and firms may determine that the additional information is required by the regulations. See Other details section under Appendix A to regulation 91-507.

Snapshot – Firms may use the snapshot message to send in creation data or for modifications, amendments, valuations and lifecycle event submissions and also in place of the PET message. However, the Snapshot message will not replace the Real Time Message.

Valuation – The use of the valuation message is encouraged as the valuation message is easier for the DDR to process than a snapshot message with valuation information included.

Document – The document message is not specifically required, however, firms are encouraged to provide the confirmation in a document message if the transaction submission cannot be fully or accurately represented within the available fields of the particular asset class. The document message should be used in conjunction with the generic fields within the message specification for each asset class. See Other details section in Appendix A to regulation 91-507.

**2.1.2.2 Message Rules**

1. All existing GTR trade reporting processes that are ‘position openers’ – that is establish a trade position in the GTR - will establish a trade position in the GTR and otherwise work exactly the same for Canadian jurisdiction trades.

2. The ISDA product taxonomy will be supported. All ISDA product taxonomy product types are supported in the GTR for all asset classes required to be reported in Canada. All ISDA product taxonomy product types will be supported for Canadian jurisdiction trades.

**2.1.2.3 Creation Data**

The regulations set out specific fields that need to be reported (See Appendix A to regulation 91-507). The majority of these fields are already in existence and currently supported globally by the GTR. Most of the Creation Data fields were created for Dodd-Frank reporting specifically. However, two fields were created specifically for EMIR reporting and three new fields need to be created for Canada only reporting. “EMIR fields” refers to any field created specifically for the EMIR regulations. The EMIR fields included in the Creation Data fields are Lifecycle Event and UTI (see separate section on UTI herein, BR-3). The new fields for Canada only reporting that need to be created are Jurisdiction of the Reporting Counterparty, Jurisdiction of the non-Reporting Counterparty and Inter-affiliate. The Dodd-Frank Fields and EMIR fields will be available on Participant reports on the compliance date, however, UTI should not be used until Phase 2, see BR-3. The new Canadian fields will not be available for participant’s reports until Phase 2, March 31, 2015. To be clear, however, all information/fields required by the regulations will be able to be provided through the GTR on the dates each field or piece of information is required, so firms will be able to meet their reporting requirements. While the new Canadian fields will not be ready until March 31, 2015, firms will be able to report the required data. The inter-affiliate field does need to be reported until April 30, 2015, so there is no issue if that field is not available until March 31, 2015. The Jurisdiction of the reporting party and non-reporting party fields will be handled in the interim period, October 31, 2014 to March 31, 2015, by using the Additional Repository 3 field. The reporting schema will be to populate the local jurisdiction for each counterparty in this field. For example, if the reporting party and non-reporting party are each local counterparties in all three jurisdiction, the field will be populated as “RP:CA.MB.MSC;CA.ON.OSC;CA.QC.AMF:NRP:CA.MB.MSC;CA.ON.OSC;CA.QC.AMF”. RP represents the reporting party and NRP represents he non-reporting party. In another scenario, if the RP is not local in any jurisdiction and he NRP is local in Quebec, the reporting string would be “NRP:CA.QC.AMF”. And finally, if the RP was local in Ontario and the NRP in Manitoba, the string would be “RP:CA.ON.OSC:NRP:CA.MB.MSC”. Where only one submission is made, such as in the case of DS Match, where each party claims to be the reporting party, RP1 and RP2 will be used to denote the local provinces of each party. RP1 will match Party 1 on the transaction and RP2 will match Party 2 on the transaction. See Appendix A for additional use cases and the how to populated the fields for CSV and FpML. After March 31, 2015, two new fields will be available and will be used to pass the local counterparty information in messages.

All message types will continue to be supported for Canadian reporting, the PET message, the Confirmation Message, the Combination Messages, the Snapshot Message, the Valuation Message and the Document Message. Canadian reporting requires creation data to be reported real time and if real time is not possible then as soon as technically practicable, but not later than the end of the business day following the day the data would otherwise be required to be reported. There is no requirement to use a specific message type and a snapshot message will serve for reporting creation data for a specific transaction. Please note the earlier disclaimer that the snapshot message cannot be used in place of the realtime message.

The PET message can be used to support the real time reporting requirement of creation data (Note, this does not mean that the PET can be used in place of the Real Time Message, it cannot. RealTime as used here does not refer to the reporting of transaction for public dissemination). While there is no requirement for a PET message under the Canadian regulations, the timing required by the regulations for provision of creation data will require firms to use either the PET message or Snapshot message to report creation data. The PET message contains all of the fields required under the regulations for every asset class.

**2.1.2.4 Life Cycle Event Data**

Life-cycle data must be reported by the end of the day the life-cycle event occurs or if that is not technically practicable the end of the business day following the day on which the life-cycle event occurs. Life Cycle events can be submitted as they occur or each individual event provided in a batch file at the end of the day they are due to be reported. To be clear, the regulators have detailed the need to use a separate submission for each lifecycle event and not just report an end of day position (This differs from the DFA requirement).

**2.1.2.5 Valuation Data**

Valuation data is to be based on industry standards and is to be provided daily, using the previous day’s valuation, by derivatives dealers and recognized or exempt clearing agencies and quarterly by all others based on the last day of the calendar quarter and provided no later than thirty days after the end of the calendar quarter. The valuation or snapshot message will support valuation data reporting.

**2.1.2.6 Pre-existing Transactions**

Pre-existing transactions for Derivatives Dealers and recognized or exempt clearing agencies are transactions that were entered prior to October 31, 2014 and are still live as of April 30, 2015. Pre-existing transactions for all others are transactions that were entered prior to June 30, 2015 and are still live as of December 31, 2015. These transactions are meant to be reported using specified creation data fields, see Appendix A to regulation 91-507. Because the pre-existing transactions will require standard lifecycle event and valuation reporting after April 30, 2015 or December 31, 2015, depending on the type of entity, DTCC will encourage the use of all creation data fields for pre-existing transactions to avoid receiving WACKs, which will not be suppressed for the loading of pre-existing transactions. We will support the use of the snapshot message for pre-existing trade reporting. Firms are also afforded the ability to pre-load these trades prior to the initial compliance date of October 31, 2014.

## Validations

### Business Validation

Business validations will be applied at the point of in-bound submission processing to ensure integrity and logical consistency. These validations will:

1. Ensure that the messages are well formed and provide a logical and complete description of the trade economics.
2. Ensure that we do not degrade the quality of the information held within the repository by allowing incomplete or illogical trade descriptions to be accepted and stored.

On completion of business validation the message should be acknowledged to the submitter, with a positive or negative acknowledgement, as appropriate.

### 2.2.2 Regulatory Validation

If a message passes the business validation it will be accepted into GTR. The validation on the message template will be enhanced to ensure, where possible, the validation is also taking into account that it is Canadian reportable. Any additional warnings where a message appears illogical or non-compliant with regulatory validation rules will be reflected on the warning report. Canadian warnings have not yet been determined. The delivery of the regulatory validations for Canada will not occur until March 31, 2015 (see BR-10 herein). WACKs will not be created on a provincial basis, but rather will operate on a Country basis, to prevent customers from receiving multiple warnings for each province reported for each issue. This document will be updated when the warnings to be used are determined.

## Unique Transaction Identifiers

The rules set out that a Repository may use its own methodology for creating the unique transaction identifier *(note this is not the European Unique Trade Identifier, although that UTI will also work as a Canadian UTI)*. ISDA is setting the transaction identifier specifications from an industry perspective and expects to use the global UTI specification. The DDR will provide the USI, UTI and our ref/your ref fields for Canadian reporting, however, the provision of these fields will need to be completed in phases. In Phase 1, running through March 31, 2015 (see BR-10 herein), the DDR will only be able to provide the use of the USI fields. While the UTI will be shown on the outbound participant reports, the UTI will not be shown on the outbound regulatory reports in Phase 1. Further, the industry has determined that using the UTI field prior to March 31, 2015 is inadvisable due to the locking feature of the field. The GTRCreate functionality, allowing participants to request the DDR to create the USI, will be available in Phase 1 and will remain available for Canadian reporting. For participants who are not NFA registered, they may use their LEI identifier or their DTCC ID in the USI prefix field.

In Phase 2, beginning March 31, 2015, DDR will provide the global USI/UTI (our ref/your ref) functionality. This functionality means that all three Trade Identifier fields will be provided to the regulators. The functionality also allows for mirroring; If the USI is provided and no UTI is provided, the USI will be carried into the UTI field. The same mirroring functionality applies to the participant reference fields (our ref/your ref). The participant ref fields (our ref/your ref) functionality allows for these fields to be used in the case where the USI or UTI are unknown (generally, for dual reporting situations). In these situations, the UTI can be updated later without canceling and submitting the transaction anew, avoiding the locking situation. The same applies to situations where only the USI is known and the UTI is provided on day 2. In this situation the UTI can be updated on day 2 without the locking logic requiring that the transaction be canceled and submitted anew. The GTRCreate functionality will remain available through all phases of the build and thereafter.

## Reporting

### Data Available to Regulators

#### General

For regulatory reporting in Canada we will provide standardized reports, similar to those provided to other regulators. The reporting will be based on reporting obligation, so these reports will be set out separately for each province.

Aggregated data is also required to be provided to the regulators and the GTR is responsible for detailing how the data has been aggregated. The GTR provides aggregated data to ESMA and the ESMA aggregated data reports will be used as the basis of a template for providing aggregated reports to the Canadian regulators.

#### Rules

1. The regulatory reports for each individual Province will be available for review and download from the GTR regulatory portal.

2. All existing security processes used for the GTR regulatory portal will apply to the Canadian GTR reports.

3. Reports will run per the standard batch process – Monday through Saturday @ 4am EST

4. Trades shown on the Canadian Provinces reports will be based on trades in the GTR meeting the following criteria:

a. Presence of “CA.ON.OSC”, “CA.QC.AMF” and/or “CA.MB.MSC” in the Reporting Obligation field.

b. Where the ‘Submitted for’ party named on the trade is eligible in SDO with an active/effective DDR membership for Canadian reporting.

5. The criteria of the trade removal on the Canadian reports will be based on the current rules of either internal auto-exit processing or user invoked EXITs.

### Data Available to the Public

#### Aggregated Data

On a periodic basis, the GTR must make aggregated data available to the public on open positions, volume, number and price. The data must be complemented by breakdowns, where applicable, by currency of denomination, geographic location of reference entity or asset, asset class, contract type, maturity and whether the transaction is cleared. DDR will deliver initial public aggregated data after enough data has been gathered post compliance date so that participant identification issues are not created. The regulators have asked the DDR to provide the aggregated data on a country basis rather than a provincial basis due to the data for some regions being too thin and leaving participants open to identification.

#### Production Date

Initial public aggregated reporting will be for Phase 1, to be delivered, if any build is required, for October 31, 2014. The first reports do not need to be created until sufficient data is collected to prevent identification of participant issues.

#### Transaction Level Public Dissemination

The GTR must provide a public website for the public dissemination of transactions. This requirement does not take effect until April 30, 2015 for Derivatives Dealers and recognized or exempt clearing agencies and June 30, 2015 for everyone else. The data required to be reported is a sub-set of the creation data and are the fields marked “Required for Public dissemination” in Appendix A of the regulation 91-507.

Derivatives Dealers transactions must be reported by the end of the next day and all others transactions reported by the end of the second day. Due to the delayed reporting time, there will be no need for block rule determination. The regulations do not require capping and rounding, but we may want to consider both for anonymity purposes. Masking for Commodities has also been raised and ISDA will raise all these issues to the regulators.

##### Description

Firms are required to report transaction level data. This data must be made publically available at the end of each business day in a format that is easily accessible to the public. DTCC will leverage the existing DDR Real Time public website in order to present these end of day reports to the public.

##### Rules

Data will be made available to the public in accordance with Canadian regulation at the end of each day. The regulation for TR’s seeks a daily report to be made publically available.

The report will run with the following rules:

1. Participants will provide a Real Time message for each submission requiring transaction level public dissemination
2. Data will be made available on the Canadian public reports only where submitters use one or more of the following reporting obligations in their Real Time Submissions.
   1. “CA.ON.OSC”
   2. “CA.QC.AMF”
   3. “CA.MB.MSC”
3. The real time application will generate an end of day file.
4. The end of day file will contain price discovery data which has been received from the reporting counterparty on the day following the submission where at least one counterparty to the submission has indicated they are a derivatives dealer.
5. The end of day file will contain price discovery data which has been received from the reporting counterparty two days following the submission where neither counterparty to the submission has indicated they are a derivatives dealer.
6. Counterparty information including name or LEI must never be made publically available
7. Data should be published to a separate tab of the current DDR Real Time Dissemination website
8. Canada reports should not be intermingled with the Cumulative end of day files for CFTC
9. Inter-affiliate trades are not required to be publically reported and as such should not be available on Canadian public reports

The following grid provides hypothetical examples of when the GTR may receive data and when such data is expected to be made publically available.

|  |  |  |
| --- | --- | --- |
| **TR Data Receive Date** | **Derivatives Dealer** | **Dissemination Date** |
| Nov-1-2015 13:30 UTC | Yes | Nov-2-2015 24:00 UTC |
| Nov-1-2015 23:59 UTC | Yes | Nov-2-2015 24:00 UTC |
| Nov-2-2015 00:01 UTC | Yes | Nov-3-2015 24:00 UTC |
| Nov-1-2015 13:30 UTC | No | Nov-3-2015 24:00 UTC |
| Nov-1-2015 23:59 UTC | No | Nov-3-2015 24:00 UTC |
| Nov-2-2015 00:01 UTC | No | Nov-4-2015 24:00 UTC |

##### Data Fields to Be Made Publically Available

The data elements to be made available to the public are those in Appendix A to regulation 91-507 and marked “Required for Public Dissemination.”

##### Production Date

This functionality will be delivered for Phase 3 on April 30, 2015.

**2.4.2.3 Data Available to Participants**

We will provide all currently available reports to the web portal with Canadian jurisdiction for access by reporting parties and registered parties where trades have been reported on their behalf. The Canadian information will be provided on the reports currently provided for CFTC trades. Because the Canadian jurisdictions and CFTC are all in the US data center, the information on the current reports will include all Canadian and CFTC information intermingled on the same reports.

## Jurisdiction

### Description

The GTR will be modified to accept “CA.ON.OSC”, “CA.QC.AMF” and/or “CA.MB.MSC” as valid jurisdictions when reporting transactions. All GTR features associated with jurisdiction reporting will be supported, except counterparty masking. The ability to do selective counterparty masking will not be supported.

The Canadian provincial jurisdictional indicators (each provincial indicator) are equivalent but separate to the current “CFTC”, “JFSA” “EMIR”, “HKMA” and “MAS” jurisdictions.

Trades may be solely a specific provincial jurisdiction and will then only be reported to the specified Province. Trades may have a combination of jurisdictions including multiple Canadian Provinces and such trades will be reported to all named jurisdictions, including the specified Provinces. Trades reported to the GTR will not be reported to a province if that Province is not specified under Reporting Obligation. Using existing GTR processes, a GTR trade that has already been reported to another jurisdiction for reporting purposes may be updated to add a specific province or provinces as jurisdiction/jurisdictions. Canadian jurisdiction removal “-CA.QC.AMF” is supported.

**2.5.2 Rules**

1. The additional enumerated value of a specified Province would only be relevant to the Reporting Obligation field. No other reporting fields would be used to determine the Canadian reporting eligibility.

2. New repository indicators under DDR (Canada) will be needed in SDO to determine Canadian reporting eligibility for regulators.

3. The specific jurisdiction names are those as determined by FpML, which are:

a. Ontario = CA.ON.OSC

b. Manitoba = CA.MB.MSC

c. Quebec = CA.QC.AMF

### 2.5.3 Production Date

The Jurisdiction changes must be in production during Phase 1 on or before July 11, 2014.

**2.6 BR6: SDO**

**2.6.1 Description**

Canadian reporting will be a service of DDR. A participant reporting to a specific province must be a DDR registered participant. Only those DDR member firms that elect to use the Canadian trade repository service are allowed to submit trade data for Canadian reporting purposes, however, there are no validations to prevent reporting by non-Canadian registered DDR participants.

To allow GTR operations to enforce the appropriate membership controls for the use of the DDR trade repository, Canadian reporting will require one indicator. These indicators will be added in the current location for the ‘DDR’ and ‘DDRL’ indicators. Only when GTR Operations have set the appropriate DDR Provincial indicator and when the effective date of that indicator has been reached will trades submitted to the GTR be processed and sent to the specific Canadian Province. Because other provinces may go live in the future, outside of Ontario, Quebec and Manitoba, the use of a table to detail provinces should be considered to aid the updating required for SDO.

Because of the nature of Canadian reporting, i.e., multiple jurisdictions being added at multiple times, in addition to SDO being built to accommodate individual jurisdictions, SDO will also have a “Canada” indicator whereby if a firm chooses to on-board for “Canada” rather than individual jurisdictions, then all current and future jurisdictions will be added automatically. This “Canada” selection will not be a valid jurisdiction, but rather will be for on-boarding purposes to prevent the need for firms to on-board multiple times.

**2.6.2 Rules**

1. The ‘DDR (Provincial)’ indicators for Canadian reporting must be separate indicators that indicate an account has completed all the onboarding requirements for reporting to a particular province or provinces or if the “Canada” choice is selected all current and future jurisdictions will be indicated as having all onboarding requirements completed.

2. The “Provincial” and “Canada” indicators should be added to the current location of the ‘DDR’ and ‘DDRL’ indicators.

3. Operations will select the “DDR (‘Provincial’)” or “DDR (‘Canada’)” indicator(s) when a firm completes the Canadian onboarding process.

4. An effective date of the ‘DDR (Provincial)’ indicator(s) at the account level must be available

5. An effective date of the ‘DDR (Provincial)’ indicator(s) at the asset class level must be available.

**2.6.3 Performance Requirements**

The SDO changes must not compromise the accurate provisioning of regulatory access (i.e. only CFTC trades should be directed to CFTC and only CFTC-“Specific Canadian province” or “Specific Canadian Province” only trades should be reflected on “Specific Canadian Province” reports, etc.)

**2.6.4 Production Date**

The SDO changes must be delivered for production during Phase 1 on or before July 18, 2014.

**2.7 Central Counterparties (CCP)**

The current DCO workflow will continue for Recognized or Exempt Clearing Agencies/CCPs in Canada as long as they operate under the current Alpha, Beta and Gamma schema. The Canadian CCPs will also be considered Trusted Sources for reporting purposes, under this schema.

**2.8 Billing**

TBD

**2.9 Data Staging and Backloading**

Phase 1 for jurisdiction and participant reporting is in production as of July 11, 2014. Firms are able to backload and conduct data staging exercises significantly prior to the compliance date without reports being generated for the regulators. We will organize any requirements for a data staging exercise on the DTCC Canadian working group. On compliance date, the DDR will turn on regulator reports and begin reporting to the regulators from October 31, 2014.

**2.10 DTCC Build Phases and Dates**

**Phase 1a – Production Date July 11, 2014**

* Will deliver jurisdictions for intake of participant reporting
* Will deliver Commodities PET message with additional fields as optional
* Will deliver Participant reports

**Phase 1b – Production Date July 18, 2014**

* Will deliver SDO modifications for on-boarding

**Phase 1c – Production date October 31, 2014**

* Will deliver Regulatory Reports
* Will deliver public aggregated reports

**Phase 2 – March 31, 2015**

* + Will deliver 3 new Canadian fields, Jurisdiction of the Reporting Counterparty, Jurisdiction of the non-Reporting Counterparty and Inter-affiliate
  + Will deliver participant reports with new Canadian fields
  + Will deliver USI/UTI (Our ref/Your ref) global functionality
  + Will deliver Regulatory validations (WACKS)

**Phase 3 – April 30, 2015**

* Will deliver public transaction level dissemination

**Appendix A**

Canada Local Counterparty Reporting using Additional Repository 3 fields

Additional Repository 3 fields are to be used to indicate the Canadian jurisdictions where the trading counterparties are local counterparties. This is an interim solution until new fields for representing local counterparty information are created and ready for use on March 31, 2015. The functionality of the Additional Repository 1 &2 fields is not being altered and should be used in accordance with the existing instructions listed on technical message specs for each asset class.

* The following is how the Additional Repository 3 fields should be used for Canada Local Counterparty Reporting:
* Additional Repository 3 Prefix – “Internal”
* Additional Repository 3 Party ID Value – the schema as outlined in scenarios below
* Additional Repository 3 Trade ID – Blank

|  |  |  |  |
| --- | --- | --- | --- |
| Scenario # | Description | CSV submission | FpML Submission |
| 1 | DS Match reports for both counterparties such that both counterparties are Reporting Parties on the trade, and both are Local Counterparties in different Canadian Provinces, RP1 in Manitoba and Ontario and RP2 in Quebec. | Additional Repository 3 Party ID Value = RP1:CA.MB.MSC;CA.ON.OSC:RP2:CA.QC.AMF | <party id="AdditionalRepository3">  <partyId partyIdScheme="http://www.dtcc.com/participant-internal-identifier"> RP1:CA.MB.MSC;CA.ON.OSC:RP2:CA.QC.AMF </partyId>  </party> |
| 2 | If both Reporting Party and Non Reporting Party fall under local counterparty jurisdiction, RP in Manitoba and NRP in Ontario and Quebec. | Additional Repository 3 Party ID Value = RP:CA.MB.MSC:NRP:CA.ON.OSC;CA.QC.AMF | <party id="AdditionalRepository3">  <partyId partyIdScheme="http://www.dtcc.com/participant-internal-identifier"> RP:CA.MB.MSC:NRP:CA.ON.OSC;CA.QC.AMF </partyId>  </party> |
| 3 | If Non Reporting Party does not fall under local counterparty jurisdiction and only Reporting Party fall under local counterparty jurisdiction, Manitoba and Ontario. | Additional Repository 3 Party ID Value = RP:CA.MB.MSC;CA.ON.OSC | <party id="AdditionalRepository3">  <partyId partyIdScheme="http://www.dtcc.com/participant-internal-identifier"> RP:CA.MB.MSC;CA.ON.OSC </partyId>  </party> |
| 4 | If Reporting Party does not fall under local counterparty jurisdiction and only Non Reporting Party falls under local counterparty jurisdiction | Additional Repository 3 Party ID Value = NRP:CA.QC.AMF | <party id="AdditionalRepository3">  <partyId partyIdScheme="http://www.dtcc.com/participant-internal-identifier"> NRP:CA.QC.AMF </partyId>  </party> |