

The start of real-time reporting of interest rate and credit swaps has raised some questions regarding the information that needs to be real time reported with respect to swaps allocated after execution. This document intends to provide guidance around some of the issues raised.

Real-Time Reporting and Allocations

The final Real-Time Reporting Rule explains that only pre-allocation data must be publicly disseminated.

“The Commission clarifies that the swap transaction and pricing data that must be publicly disseminated is pre-allocation data. Accordingly, the notional or principal amount that would be publicly disseminated would be the pre-allocated amount.” 77 Fed. Reg. 1182, 1195.

While the submission of data for real time reporting is the responsibility of the reporting party, a correct submission (or non-submission for the non price forming post-allocation data) is dependent on clear and timely indications by the counterparty as to when transactions are allocations rather than new transactions. Counterparties who become aware of any errors or omissions in swap transaction that has been publicly disseminated must promptly report such information to the reporting party and the reporting party must correct or cancel the incorrectly reported transaction information.

Real Time Reporting Caps on Notional or Principal Amounts

The final Real-Time Reporting Rule also provides for notional and principal caps for different asset classes when publicly disseminating transaction information. The following notional caps are currently in place until such time as the CFTC realigns them:

Swap Category Cap

Rates	IRS with a tenor greater than 0 up to and including 2 years: USD \$250mm
	IRS with a tenor greater than 2 years up to and including 10 years: USD \$100mm
	IRS with a tenor greater than 10 years: USD \$75mm
Credit	Notional or principal amount: USD \$100mm
Equity	Notional or principal amount: USD \$250mm
FX	Notional or principal amount: USD \$250mm
Other Commodities	Notional or principal amount: USD \$25mm