

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 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.

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

Swap Data Repositories: Registration Standards, Duties and Core Principles

Mandatory registration and compliance with registration rules is required. 76 FR 54538

Registration of SDs and MSPs

SDs and MSPs must register. 77 FR 2613

Position Limits for Futures and Swaps

Compliance date for spot-month limits and non-spot-month legacy limits. 76 FR 71626

Commodity Options

Compliance date. 77 FR 25320

Real-Time Public Reporting of Swap Transaction Data

Compliance date for SEFs, DCMs, SDRs, SDs, and MSPs with respect to credit swaps and interest rate swaps. 77 FR 1182

Swap Data Recordkeeping and Reporting Requirements

Compliance date for SEFs, DCMs, DCOs, SDRs, SDs, and MSPs with respect to credit swaps and interest rate swaps. 77 FR 2136

Swap Data Recordkeeping and Reporting Requirements: Pre-Enactment and Transition Swaps

Compliance date for SDs and MSPs with respect to credit swaps and interest rate swaps. 77 FR 35200

OCTOBER 12

2012

SEPTEMBER 15

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

OCTOBER 14

Business Conduct Standards for SDs and MSPs

Compliance date.

77 FR 9734

DECEMBER 14

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

DECEMBER 29

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

DECEMBER 31

CPOs and CTAs: Compliance Obligations

Compliance date for all remaining provisions of rule. 77 FR 11252

KEY

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

This summary is for convenience only and is not intended to be complete or authoritative. It takes into account only published, final rules in effect on the date hereof 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

2013

JANUARY 10

Real-Time Public Reporting of Swap Transaction Data

Compliance date for SEFs, DCMs, SDRs, SDs, and MSPs with respect to equity, foreign exchange, and “other commodity” asset classes.

77 FR 1182

Swap Data Recordkeeping and Reporting Requirements

Compliance date for SEFs, DCMs, DCOs, SDRs, SDs, and MSPs with respect to equity, foreign exchange, and “other commodity” swaps.

77 FR 2136

Swap Data Recordkeeping and Reporting Requirements: Pre-Enactment and Transition Swaps

Compliance date for SDs and MSPs with respect to equity, foreign exchange, and “other commodity” swaps.

77 FR 35200

MARCH 29

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

APRIL 10

Real-Time Public Reporting of Swap Transaction Data

Compliance date for all publicly reportable swap transactions in all asset classes

77 FR 1182

Swap Data Recordkeeping and Reporting Requirements

Compliance date for counterparties that are not SDs or MSPs.

77 FR 2136

Swap Data Recordkeeping and Reporting Requirements: Pre-Enactment and Transition Swaps

Compliance date for counterparties that are not SDs or MSPs.

77 FR 35200

KEY

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