

Reminder: Deadline for Obtaining CFTC Interim Compliance Identifier for Parties Trading in Swaps

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On March 15, 2013, the Commodity Futures Trading Commission's Division of Market Oversight and Office of Data and Technology issued an advisory, reminding all swap market participants of the imminent deadline to comply with certain swap data recordkeeping and reporting rules. In particular, any swap market participant (including any fund or managed account client that engages in swaps) must have obtained, prior to **April 10, 2013**, a CFTC Interim Compliance Identifier ("CICI"), and must use the CICI in recordkeeping and swap data reporting going forward.

In addition, any swap market participant that previously obtained a CICI by means of third party registration must self-certify the CICI data record **before April 10**.

Investment managers should confirm as soon as possible that each client that engages in swaps activity has properly complied with this requirement. Any swap market participant may confirm its current status, obtain a CICI or self-certify data for a previous third party registered CICI by means of the CICI Utility.

A copy of the CFTC's recent advisory may be found by clicking [here](#).

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