AMHERST
PIERPONT

February 22, 2018

By Electronic Mail

Brent J. Fields
Secretary
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-1090
rule-comments@sec.gov

Re: *Request for Extension of Time for Commission Action on Notice of Filing of Proposed Rule Change by the Government Securities Division of Fixed Income Clearing Corporation Regarding Its Required Fund Deposit Calculation; Release No. 34-82588; File No. SR-FICC-2018-001*

Amherst Pierpont Securities LLC ("APS" or "Company")[1] respectfully requests that the U.S. Securities and Exchange Commission ("Commission") extend the time for Commission action on the proposed rule change identified above regarding the Required Fund Deposit calculation ("RFDC Proposal") by FICC GSD to provide additional time for meaningful review of the RFDC Proposal given its length and complexity.[2] The RFDC Proposal would change the GSD rules regarding its method of calculating Netting Members' margin, which is referred to as the Required Fund Deposit amount, and it was published in the Federal Register on February 1, 2018. Comments are due on February 22, 2018, and subject to possible extensions of the time period for Commission action the Commission must approve, disapprove, or institute proceedings to determine whether to disapprove the proposed rule change not later than March 16, 2018.[3] FICC GSD indicates in its proposed rule change that it also submitted the proposal as an advance notice filing with the Commission; however, the Commission has not yet published that filing for notice and public comment.

[1] APS is an independent broker-dealer operating in the fixed-income capital markets with more than 200 employees in locations across the United States and an affiliate in Hong Kong. The Company is a self-clearing member of the Mortgage-Backed Securities Division and Government Securities Division ("GSD") of Fixed Income Clearing Corporation ("FICC") and is also a member of the Financial Industry Regulatory Authority and Securities Investor Protection Corporation.

[2] Securities Exchange Act Release No. 34-82588 (January 26, 2018); 83 FR 4687 (February 1, 2018) (SR-FICC-2018-001).

[3] 15 U.S.C. 78s(b)(2)(A)(i). The forty-fifth day from publication in the Federal Register is Sunday, March 18, 2018, so the final business day on which the Commission may take action is March 16.

245 Park Avenue, 15th Floor | New York, NY 10167 | TEL: (646) 776-7700 | FAX: (646) 776-7701 | www.apsec.com

APS believes that the proposed changes present novel and complex issues under Section 17A of the Securities Exchange Act of 1934[4] and the Payment, Clearing, and Settlement Supervision Act of 2010[5] with respect to FICC GSD's risk management practices and, among other things, its obligation under Commission rules to establish, implement, maintain and enforce written policies and procedures reasonably designed to provide "sufficient information to enable its participants to identify and evaluate the risks, fees, and other material costs they incur by participating in" FICC.[6] In light of this, and due to FICC's position as a covered clearing agency[7] and a systemically important financial market utility,[8] these matters deserve thorough consideration by FICC GSD clearing members, market participants, and the public, and the Commission and FICC deserve the benefit of meaningful comments that respond to these matters in full. More time is needed to achieve these important objectives.

For these reasons, APS believes that FICC should consent to an extension of the period for Commission action on the proposed rule change for an additional 45 days or, if FICC is not willing to do so, the Commission should extend the time for Commission action consistent with its authority in Section 19(b)(2) of the Securities Exchange Act. We believe such an extension is appropriate for the reasons described above and to allow for better understanding of, and comment on, the nature and appropriateness of the RFDC Proposal. Areas of the RFDC Proposal that APS believes warrant more time for review and evaluation include, but are not limited to, the appropriateness of the proposed changes to the VaR charge component, excess capital premium calculation and blackout period exposure adjustment.

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If you have any questions, please do not hesitate to contact me at [redacted].

Sincerely,

Michael J. Santangelo
Chief Financial Officer
Amherst Pierpont Securities LLC

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[4] 15 U.S.C. 78q-1.

[5] 12 U.S.C. 5301.

[6] 17 CFR 240.17Ad-22(e)(23)(ii).

[7] 17 CFR 240.17Ad-22(a)(5).

[8] On July 18, 2012, the U.S. Financial Stability Oversight Council designated FICC as a systemically important financial market utility pursuant to its authority under the Payment, Clearing, and Settlement Supervision Act. See 12 U.S.C. 5463.