



570 Washington Boulevard  
Jersey City, NJ 07310

September 26, 2024

**Via Electronic Mail** ([rule-comments@sec.gov](mailto:rule-comments@sec.gov))

Secretary  
U.S. Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549

**Re: Response to Second Request for Additional Information (“RFI Response”) for File No. SR-FICC-2024-801**

Dear Secretary:

Fixed Income Clearing Corporation filed an RFI Response for File No. SR-FICC-2024-801 on September 26, 2024, a copy of which is enclosed.

Respectfully,

Fixed Income Clearing Corporation

Response to Second Request for Additional Information  
("RFI Response") for File No. SR-FICC-2024-801

**The information contained in this RFI Response is subject to exemption from mandatory disclosure under Exemptions #4 and #8 of the Freedom of Information Act because the information concerns (i) trade secrets and commercial information that is privileged or confidential and (ii) the supervision of Fixed Income Clearing Corporation (FICC), a financial institution. This RFI Response consists of sensitive business information and data, which are not intended for public disclosure. Accordingly, this RFI Response has been redacted and confidential treatment requested pursuant to 17 CFR 240.24b-2. An unredacted version was filed separately and confidentially with the Securities and Exchange Commission. This RFI Response contains electronic files embedded on one page for filing efficiency, as listed below.**

Embedded Files:

- MMARFI\_Q1\_data\_final; spreadsheet file; Backtesting analyses for SVaR and Margin Proxy plus MMA with alternative stress periods.
- Impact Study on Cross Margin with MMA; spreadsheet file; MMA impact analysis relating to the CME-FICC cross margining arrangement.
- MMARFI\_Q3\_data\_final; spreadsheet file; MMA impact analysis relating to Treasury bonds and MBS pools.

RFI Response for SR-FICC-2024-801

Fixed Income Clearing Corporation (“FICC”) is submitting its response to a second request for additional information issued by the Securities and Exchange Commission (“Commission”) pursuant to Section 806(e)(1)(D) of Title VIII of the Dodd-Frank Wall Street Reform and Consumer Protection Act, entitled the Payment, Clearing, and Settlement Supervision Act of 2010, with respect to advance notice SR-FICC-2024-801.

**FICC’s response is redacted in its entirety and filed separately with the Commission. Confidential treatment of the redacted pages is being requested pursuant to 17 CFR 240.24b-2.**

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