

Commentary on proposal SR-OCC-2024-001

1. The proposal fails to consider the risks associated with reducing margin requirements, particularly in light of the clearing member's potential default.
2. The proposed rule change does not provide a valid model for calculating margin levels commensurate with risks.
3. The proposal does not specify clear lines of responsibility, and the FRM Officer's role is unclear.
4. The proposal fails to properly manage liquidity risk and increases systemic risk.
5. The proposed rule change does not provide a valid model for the margin system.

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