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Client Alert: CFTC Staff Provides No-Action Relief from March 1, 2016 Deadline for Form TO Reporting for Otherwise Unreported Trade Options

February 18, 2016 | *Lisa G. Dowden*

The CFTC has granted temporary relief from the March 1 deadline for entities that must report “otherwise unreported” trade options on Form TO. While the Commission has not made a permanent decision on Form TO reporting as contemplated in a recent Notice of Proposed Rulemaking, the CFTC staff no-action letter related to Form TO reporting, otherwise due March 1, provides some reason for optimism. The no-action relief extends to April 1, 2016, and it may be that the CFTC expects to issue a final action on the proposed rule by then. If your utility is neither a swap dealer nor a major swap participant, your Form TO reporting obligations may have been eased.

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