



December 17, 2014

Via Electronic Submission

The Secretary
Ontario Securities Commission
20 Queen Street West
19th Floor, Box 55
Toronto, Ontario M5H 3S8
Email: comments@osc.gov.on.ca

Re: Proposed Amendments to OSC Rule 13-502 – Fees and Companion Policy 13-502CP Fees

Dear Sirs/Mesdames:

CME Group Inc. (“CME Group”) appreciates the opportunity to comment on the Ontario Securities Commission (“OSC”) request for comments regarding proposed amendments to OSC Rule 13-502 – Fees and Companion Policy 13-502CP Fees (collectively, the “Fee Rule”). CME Group operates multiple repository services, including a designated trade repository registered with OSC, the Manitoba Securities Commission and the Autorite des marches financiers, a swap data repository registered with the Commodity Futures Trading Commission and a trade repository registered with the European Securities Markets Authority.

Our only comment relates to OSC’s proposal to increase the annual trade repository registration fee from the current \$30,000 per year level to \$75,000 per year. We do not believe there is a reasonable basis to justify a 150% increase in the registration fee at this point in time.

The rationale for the very significant increase appears to be staff estimates regarding “future actual costs” associated with monitoring how trade repositories meet applicable requirements. However, trade reporting in Ontario began on October 31, 2014, that is, less than two months ago. Prior to that point in time, the three designated trade repositories were simply applying for designation. OSC is separately proposing substantial increases to the trade repository application fee to address these costs.

Trade repositories have a high cost structure. Fee increases of the magnitude proposed in the Fee Rule have significant consequences to the operators of these critical market infrastructures. Unanticipated 150% fee hikes should not be taken lightly. The agency should articulate a well-reasoned and specific rationale justifying the need to take this step before doing so - we urge the OSC to reconsider its current proposal. Repositories should not be asked to absorb these fee increases a mere two months after the beginning of reporting.

CME Group appreciates the opportunity to comment on the Fee Rule. If you have any questions or comments, please feel free to contact me at Jonathan Thursby or jonathan.thursby@cmegroup.com.

Sincerely,

A handwritten signature in black ink that reads "Jonathan Thursby". The signature is fluid and cursive, with the first name being more prominent.

Jonathan Thursby
Executive Director COO SDR Services