



ICAP Global Derivatives Limited
2 Broadgate
London
United Kingdom
EC2M 7UR

July 1, 2020

Submitted via CFTC Portal

Mr. Christopher J. Kirkpatrick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: ICAP Global Derivatives Limited – Regulation 40.6(a) Rule Certification – Notification of Amendments to IGDL Discount Structure Appendix (IGDL-2020-R-4)

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c) of the Commodity Exchange Act, as amended (the “Act”), and Section 40.6(a) of the regulations of the Commodity Futures Trading Commission (the “Commission”), ICAP Global Derivatives Limited (“IGDL”), a registered swap execution facility, hereby notifies the Commission that it wishes to amend the IGDL SEF Discount Structure Appendix to its fee schedule (the “IGDL Discount Structure Appendix”), as described more fully in the Exhibits attached hereto. The amended IGDL Discount Structure Appendix will become effective on July 16, 2020.

Pursuant to Commission Regulation 40.6, this submission includes:

- (i) A concise explanation and analysis of the amended IGDL Discount Structure Appendix and its compliance with applicable provisions of the Act, attached as Exhibit A;
- (ii) A clean copy of the amended IGDL Discount Structure Appendix, attached as Exhibit B; and
- (iii) A copy of the amended IGDL Discount Structure Appendix marked to show changes to the currently effective version, attached as Exhibit C.



IGDL hereby certifies that the amendment complies with the requirements of the Act and Commission regulations thereunder. IGDL is not aware of any substantive opposing views expressed with respect to this filing and certifies that, concurrent with this filing, a copy of this submission was posted on IGDL's website.

Please contact Brian D. Donnelly, Chief Compliance Officer, at (201) 984-6956 or by email at bddonnelly@tullettprebon.com with any questions regarding this matter.

Very truly yours,

ICAP Global Derivatives Limited

A handwritten signature in black ink, appearing to read 'B. Donnelly', written over a horizontal line.

By: _____

Name: Brian D. Donnelly

Title: Chief Compliance Officer

Date: July 1, 2020

Enclosures

cc: CFTC Division of Market Oversight (dmosubmissions@cftc.gov)
Nancy Markowitz, CFTC (nmarkowitz@cftc.gov)

Mr. Christopher J. Kirkpatrick
July 1, 2020

EXHIBIT A

Explanation of Amendments to IGDL Discount Structure Appendix

IGDL has amended the IGDL Discount Structure Appendix to make the following changes:

- Revised the brokerage discount for voice thresholds by adding a discount rate of 35% to monthly thresholds of \$400,000 or greater.
- Made certain non-substantive and conforming changes.

IGDL has reviewed the swap execution facility core principles (“Core Principles”) as set forth in the Act and has determined that each of the foregoing changes complies with the requirements of impartial access in Core Principle 2 and Commission Regulation 37.202 because all fees will be applied in an impartial, fair and non-discriminatory manner.

Mr. Christopher J. Kirkpatrick
July 1, 2020

EXHIBIT B

IGDL Discount Structure Appendix

(Clean Version)

IGDL SEF Discount Structure Appendix

July 2020

IGDL Discount Structure

Brokerage Discounts for i-Swap	
Brokerage Discounts	<ul style="list-style-type: none"> i-Swap rate is 0.0175 bp Trader-entered and Broker-entered transactions are eligible to offset i-Swap minimum fees

Brokerage Discounts for Voice		
Brokerage Discounts <i>(thresholds based off and discounts applied to gross voice execution brokerage in the current month)¹</i>	<u>Monthly Threshold</u>	<u>Discount</u>
	\$75,000 to \$149,999	5%
	\$150,000 to \$249,999	10%
	\$250,000 to \$399,999	20%
	\$400,000 or Greater	35%

i-Swap Streaming Program		
Streaming Tiers and Discounts <i>(applied to gross voice execution brokerage in following month)</i>	Premium Tier	
	<u>Rank</u>	<u>Discount</u>
	#1	15%
	#2	13%
	#3	12%
	Rest	10%
	Base Tier	
5% for Base Tier Qualifying Participants		

eTrading Discounts		
eTrading Discounts <i>(applied to current month's i-Swap brokerage)</i>	<ul style="list-style-type: none"> Applies to all i-Swap Participants, no monthly fee required Participants ranked based on billable DV01 volume Discounts applied to i-Swap brokerage up to \$25k 	
	<u>Rank</u>	<u>Discount</u>
	#1	100%
	#2	50%

¹ Applies to Fixed/Floating USD Interest Rate Swaps. Excludes FRA, OIS, and Single Clearing House Basis swaps.

Key Notes: IGDL Discount Structure

For Brokerage Discounts on Voice:

1. Discounts are determined by combining New York and London gross voice execution brokerage and applied to activity during both London and New York hours as a rebate at the end of the month.
2. “Gross voice execution brokerage” means in respect of a Participant (i) brokerage accrued by the participant for all transactions executed using Voice RFQ and (ii) all transaction fees accrued by the participant for all transactions transacted using Broker-entered orders, including brokerage on Clearing House Basis Swaps transacted using Voice RFQ and transaction fees for Clearing House Basis Swaps transacted using Broker-entered orders.
3. Thresholds that determine the amount of the discount are calculated based on, and discounts are applied to, the gross voice execution brokerage accrued by a participant for the current month.

For i-Swap fees (as described on the Trade Execution Fee Card tab of the IGDL SEF Fee Card):

1. Calculation of “Total Monthly Electronic Fees” for i-Swap are the greater of the following:
 - a. “Trader-entered” transaction fees plus “Broker-entered” transaction fees²; or
 - b. Minimum TPH i-Swap Front End User Minimum Fee³
2. The i-Swap invoice will reflect the Total Monthly Electronic Fees (as defined above) less any Broker-entered transaction fees.

For i-Swap streaming discounts and eTrading Discounts:

1. Participants who qualify for both the Streaming Discount and the eTrading Rebate on any given month will receive the greater of the two.

² Trader-entered and Broker-entered are defined on the “Notes” tab of the ICAP Global Derivatives Limited Trade Execution Fee Card. This calculation includes fees for Clearing House Basis Swaps.

³ See Minimum Fees on the Fees tab of the IGDL SEF Fee Card

eTrading Discount Plan

Summary

IGDL has introduced an eTrading Rebate Plan to reimburse the most active participant by DV01 to the top 2 ranks.

Participants will receive periodic updates on their trading activity regarding their rank by DV01. At the end of the month, #1 ranked participant by DV01 will be eligible to receive a full rebate of their electronic brokerage up to \$25,000 and #2 ranked participant by DV01 each month will be eligible for a 50% rebate of their electronic brokerage up to \$25,000.

i-Swap Streaming Program

Summary

IGDL offers additional discounts that will be applied towards a participant's gross voice execution brokerage for a particular month based on a participant's streaming activity on i-Swap for Medium Term Interest Rate Swap instruments. IGDL offers two streaming tiers: Premium Streaming Tier and Base Streaming Tier. Participants can obtain discounts in the Base Streaming Tier by meeting the streaming requirements for the covered instruments set out below in the relevant table. Additionally, participants are eligible to achieve greater discounts by meeting the requirements in the Premium Streaming Tier. Discount percentage for those that meet the Premium Streaming Tier requirements is based on the participant's final rank in the League Table. The League Table rankings are computed by IGDL using the below defined League Table Methodology.

Discount achieved in any given month in either the Premium Streaming Tier or Base Streaming Tier will be applied to the following month's gross voice execution brokerage.

Streaming Tiers

Base Streaming Tier

Instruments	Semi-Bonds
	2y, 3y, 4y, 5y, 6y, 7y, 8y, 9y, 10y, 12y, 15y, 20y, 25y, 30y
	Spread-Overs
	2y, 3y, 4y, 5y, 6y, 7y, 8y, 9y, 10y, 12y, 15y, 20y, 30y
	Semi-Bond Curve
	2x5, 5x7, 5x10, 7x10, 10x12, 10x15, 10x20, 10x30
	Semi-Bond Butterflies
	2x3x4, 4x5x6, 5x6x7, 6x7x8, 7x8x9, 8x9x10
Total Instruments Required: 12	
Max B/O Spread: 1 bp	
% of Day Quoted: 40%	

Premium Streaming Tier

Instruments	Minimum Notional (mm)	Max B/O Spread
Semi-Bonds		
2y	150	0.5
3y	75	0.5
5y	50	0.5
10y	25	0.5
30y	10	0.5
Spread-Overs		
3y	75	0.625
5y	50	0.625
10y	25	0.625
30y	10	0.625
Semi-Bond Curve		
2 x 5	90	0.625
5 x 10	50	0.625
5 x 30	15	0.625
10 x 30	20	0.625
Semi-Bond Butterflies		
2 x 3 x 5	150	0.625
2 x 5 x 10	100	0.625
5 x 10 x 30	50	0.625
3 x 4 x 5	200	0.375
5 x 7 x 10	120	0.5
10 x 15 x 30	50	0.5
10 x 20 x 30	40	0.5
Risk Units Required:		12
% of Day Quoted:		60%

Premium Streaming Risk Units

To qualify for Premium streaming status, participant must stream a minimum of 12 Risk Units. A Risk Unit is defined as follows:

- Minimum notional streamed at max bid/offer spread per instrument = 1 Risk Unit
Example:
 - 10mm 30yr sb = 1 Risk Unit
 - 20mm 30yr sb = 2 Risk Units
- Limit 3 Risk Units per Instrument
- Participant can choose any 12 Risk Units to stream from Premium table above.

League Table Methodology

League Table rank in the Premium Streaming Tier is computed using Top of Book Points on a per instrument basis during the Calculation Time.

The score per instrument is computed as follows:

Premium streamer with highest percentage of day spent on Top of Book status awarded one point per bid or offer side, per instrument, per day.

Top of book points will be awarded on Premium Tier instruments only.

The Participant's final score is computed as the sum of their Top of Book Points each day and aggregated on a Month to Date basis. Each Participant is ranked on their computed final monthly total score.

Discount Tier Hours

Any discounts achieved will be applied to the rate in effect during the hours set forth in the following table. Base and Premium Streaming Tiers will be calculated independently in each location using the following hours (*i.e.*, IGDL will calculate rankings for the 7:30 am LDN to 7:00 am NY time period and rankings for the 7:00 am NY to 5:00 pm NY time period).

Calculation Time	Applicable Rate Discounted
7:30am LDN to 7:00am NY	Before 12:00pm LDN Rate
7:00am NY to 5:00pm NY	After 12:00pm LDN Rate

Definitions

League Table	A table that ranks each Participant based on certain performance metrics
% of Day Quoted	Percentage of snapshots taken of streaming activity during the day in which each instrument is streamed within Max Bid/Offer Spread at stated Minimum Size (if applicable).

Mr. Christopher J. Kirkpatrick
July 1, 2020

EXHIBIT C

IGDL Discount Structure Appendix

(Marked Version)

IGDL SEF Discount Structure Appendix

~~August 2019~~ July 2020

IGDL Discount Structure

Brokerage Discounts for i-Swap	
Brokerage Discounts	<ul style="list-style-type: none"> i-Swap rate is 0.0175 bp Trader-entered and Broker-entered transactions are eligible to offset i-Swap minimum fees

Brokerage Discounts for Voice											
Brokerage Discounts <i>(thresholds based off and discounts applied to gross voice execution brokerage in the current month)¹</i>	<table border="1"> <thead> <tr> <th><u>Monthly Threshold</u></th> <th><u>Discount</u></th> </tr> </thead> <tbody> <tr> <td>\$75,000 to \$149,999</td> <td>5%</td> </tr> <tr> <td>\$150,000 to \$249,999</td> <td>10%</td> </tr> <tr> <td>\$250,000 or Greater <u>to \$399,999</u></td> <td>20%</td> </tr> <tr> <td><u>\$400,000 or Greater</u></td> <td><u>35%</u></td> </tr> </tbody> </table>	<u>Monthly Threshold</u>	<u>Discount</u>	\$75,000 to \$149,999	5%	\$150,000 to \$249,999	10%	\$250,000 or Greater <u>to \$399,999</u>	20%	<u>\$400,000 or Greater</u>	<u>35%</u>
<u>Monthly Threshold</u>	<u>Discount</u>										
\$75,000 to \$149,999	5%										
\$150,000 to \$249,999	10%										
\$250,000 or Greater <u>to \$399,999</u>	20%										
<u>\$400,000 or Greater</u>	<u>35%</u>										

i-Swap Streaming Program	
Streaming Tiers and Discounts <i>(applied to gross voice execution brokerage in following month)</i>	Premium Tier
	<u>Rank</u> <u>Discount</u>
	#1 15%
	#2 13%
	#3 12%
	Rest 10%
	Base Tier
	5% for Base Tier Qualifying Participants

eTrading Discounts							
eTrading Discounts <i>(applied to current month's i-Swap brokerage)</i>	<ul style="list-style-type: none"> Applies to all i-Swap Participants, no monthly fee required Participants ranked based on billable DV01 volume Discounts applied to i-Swap brokerage up to \$25k <table border="1"> <thead> <tr> <th><u>Rank</u></th> <th><u>Discount</u></th> </tr> </thead> <tbody> <tr> <td>#1</td> <td>100%</td> </tr> <tr> <td>#2</td> <td>50%</td> </tr> </tbody> </table>	<u>Rank</u>	<u>Discount</u>	#1	100%	#2	50%
<u>Rank</u>	<u>Discount</u>						
#1	100%						
#2	50%						

¹ Applies to Fixed/Floating USD Interest Rate Swaps. Excludes FRA, OIS, and Single Clearing House Basis swaps.

Key Notes: IGDL Discount Structure

For Brokerage Discounts on Voice:

1. Discounts are determined by combining New York and London gross voice execution brokerage and applied to activity during both London and New York hours as a rebate at the end of the month.
2. “Gross voice execution brokerage” means in respect of a Participant (i) brokerage accrued by the participant for all transactions executed using Voice RFQ and (ii) all transaction fees accrued by the participant for all transactions transacted using Broker-entered orders, including brokerage on Clearing House Basis Swaps transacted using Voice RFQ and transaction fees for Clearing House Basis Swaps transacted using Broker-entered orders.
3. Thresholds that determine the amount of the discount are calculated based on, and discounts are applied to, the gross voice execution brokerage accrued by a participant for the current month.

For i-Swap fees (as described on the Trade Execution Fee Card tab of the IGDL SEF Fee Card):

1. Calculation of “Total Monthly Electronic Fees” for i-Swap are the greater of the following:
 - a. “Trader-entered” transaction fees plus “Broker-entered” transaction fees²; or
 - b. Minimum TPH i-Swap Front End User Minimum Fee³
2. The i-Swap invoice will reflect the Total Monthly Electronic Fees (as defined above) less any Broker-entered transaction fees.

For i-Swap streaming discounts and eTrading Discounts:

1. Participants who qualify for both the Streaming Discount and the eTrading Rebate on any given month will receive the greater of the two.

² Trader-entered and Broker-entered are defined on the “Notes” tab of the ICAP Global Derivatives Limited Trade Execution Fee Card. This calculation includes fees for Clearing House Basis Swaps.

³ See Minimum Fees on the Fees tab of the IGDL SEF Fee Card

eTrading Discount Plan

Summary

IGDL has introduced an eTrading Rebate Plan to reimburse the most active participant by DV01 to the top 2 ranks.

Participants will receive periodic updates on their trading activity regarding their rank by DV01. At the end of the month, #1 ranked participant by DV01 will be eligible to receive a full rebate of their electronic brokerage up to \$25,000 and #2 ranked participant by DV01 each month will be eligible for a 50% rebate of their electronic brokerage up to \$25,000.

i-Swap Streaming Program

Summary

IGDL offers additional discounts that will be applied towards a participant's gross voice execution brokerage for a particular month based on a participant's streaming activity on i-Swap for Medium Term Interest Rate Swap instruments. IGDL offers two streaming tiers: Premium Streaming Tier and Base Streaming Tier. Participants can obtain discounts in the Base Streaming Tier by meeting the streaming requirements for the covered instruments set out below in the relevant table. Additionally, participants are eligible to achieve greater discounts by meeting the requirements in the Premium Streaming Tier. Discount percentage for those that meet the Premium Streaming Tier requirements is based on the participant's final rank in the League Table. The League Table rankings are computed by IGDL using the below defined League Table Methodology.

Discount achieved in any given month in either the Premium Streaming Tier or Base Streaming Tier will be applied to the following month's gross voice execution brokerage.

Streaming Tiers

Base Streaming Tier

Instruments	Semi-Bonds	
		2y, 3y, 4y, 5y, 6y, 7y, 8y, 9y, 10y, 12y, 15y, 20y, 25y, 30y
	Spread-Overs	
		2y, 3y, 4y, 5y, 6y, 7y, 8y, 9y, 10y, 12y, 15y, 20y, 30y
	Semi-Bond Curve	
	2x5, 5x7, 5x10, 7x10, 10x12, 10x15, 10x20, 10x30	
	Semi-Bond Butterflies	
	2x3x4, 4x5x6, 5x6x7, 6x7x8, 7x8x9, 8x9x10	
Total Instruments Required:		12
Max B/O Spread:		1 bp
% of Day Quoted:		40%

Premium Streaming Tier

Instruments	Minimum Notional (mm)	Max B/O Spread
Semi-Bonds		
2y	150	0.5
3y	75	0.5
5y	50	0.5
10y	25	0.5
30y	10	0.5
Spread-Overs		
3y	75	0.625
5y	50	0.625
10y	25	0.625
30y	10	0.625
Semi-Bond Curve		
2 x 5	90	0.625
5 x 10	50	0.625
5 x 30	15	0.625
10 x 30	20	0.625
Semi-Bond Butterflies		
2 x 3 x 5	150	0.625
2 x 5 x 10	100	0.625
5 x 10 x 30	50	0.625
3 x 4 x 5	200	0.375
5 x 7 x 10	120	0.5
10 x 15 x 30	50	0.5
10 x 20 x 30	40	0.5
Risk Units Required:		12
% of Day Quoted:		60%

Premium Streaming Risk Units

To qualify for Premium streaming status, participant must stream a minimum of 12 Risk Units. A Risk Unit is defined as follows:

- Minimum notional streamed at max bid/offer spread per instrument = 1 Risk Unit
Example:
 - 10mm 30yr sb = 1 Risk Unit
 - 20mm 30yr sb = 2 Risk Units
- Limit 3 Risk Units per Instrument
- Participant can choose any 12 Risk Units to stream from Premium table above.

League Table Methodology

League Table rank in the Premium Streaming Tier is computed using Top of Book Points on a per instrument basis during the Calculation Time.

The score per instrument is computed as follows:

Premium streamer with highest percentage of day spent on Top of Book status awarded one point per bid or offer side, per instrument, per day.

Top of book points will be awarded on Premium Tier instruments only.

The Participant's final score is computed as the sum of their Top of Book Points each day and aggregated on a Month to Date basis. Each Participant is ranked on their computed final monthly total score.

Discount Tier Hours

Any discounts achieved will be applied to the rate in effect during the hours set forth in the following table. Base and Premium Streaming Tiers will be calculated independently in each location using the following hours (*i.e.*, IGDL will calculate rankings for the 7:30 am LDN to 7:00 am NY time period and rankings for the 7:00 am NY to 5:00 pm NY time period).

Calculation Time	Applicable Rate Discounted
7:30am LDN to 7:00am NY	Before 12:00pm LDN Rate
7:00am NY to 5:00pm NY	After 12:00pm LDN Rate

Definitions

League Table	A table that ranks each Participant based on certain performance metrics
% of Day Quoted	Percentage of snapshots taken of streaming activity during the day in which each instrument is streamed within Max Bid/Offer Spread at stated Minimum Size (if applicable).