
Swap Dealer Chief Compliance Officer Requirements – First Year in Review

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The CFTC by regulation requires each registered swap dealer to designate a chief compliance officer to carry out certain duties relating to swaps activities and to furnish an annual report describing the swap dealer's compliance procedures and assessing its performance. This WilmerHale article, published in the September issue of *The Review of Securities & Commodities Regulation*, reviews the rule and the CFTC's "comparability determinations" for foreign swap dealers, and discusses CCO-related developments and interpretive issues that have arisen in the first full year of the rule.

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