<table>
<thead>
<tr>
<th>REQUEST FOR RECORDS DISPOSITION AUTHORITY</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>To:</strong> NATIONAL ARCHIVES &amp; RECORDS ADMINISTRATION</td>
</tr>
<tr>
<td>8601 ADELPHI ROAD; COLLEGE PARK, MD 20740-6001</td>
</tr>
<tr>
<td><strong>Date received:</strong> 9/15/09</td>
</tr>
<tr>
<td><strong>JOB NUMBER:</strong> N1-180-09-3</td>
</tr>
</tbody>
</table>

1. **FROM (Agency or establishment):** Commodity Futures Trading Commission

2. **MAJOR SUBDIVISION:**

3. **MINOR SUBDIVISION:**

4. **NAME OF PERSON WITH WHOM TO CONFER:** Crystal Zeh

5. **TELEPHONE NUMBER:** 202-418-5035

6. **AGENCY CERTIFICATION:**
   I hereby certify that I am authorized to act for this agency in matters pertaining to the disposition of its records and that the records proposed for disposal on the attached _6_ page(s) are not needed now for the business for this agency or will not be needed after the retention periods specified; and that written concurrence from the General Accounting Office, under the provisions of Title 8 of the GAO Manual for Guidance of Federal Agencies,

- [ ] is not required
- [ ] is attached; or
- [ ] has been requested.

<table>
<thead>
<tr>
<th>DATE</th>
<th>SIGNATURE OF AGENCY REPRESENTATIVE</th>
<th>TITLE</th>
</tr>
</thead>
<tbody>
<tr>
<td>September 9, 2009</td>
<td>Crystal Zeh</td>
<td>Records Management Officer</td>
</tr>
</tbody>
</table>

7. **ITEM NO.**

8. **DESCRIPTION OF ITEM AND PROPOSED DISPOSITION:**

   See attached.

9. **GRS OR SUPERSEDED JOB CITATION:**

10. **ACTION TAKEN:**

   See attached.
INTEGRATED SURVEILLANCE SYSTEM (ISS) AND SUPPORTING ENVIRONMENT

ISS allows the agency to monitor the daily activities of large traders, key price relationships, and relevant supply and demand factors. ISS data enables the agency to analyze the composition of the market, such as the participation in the market by commercial versus non-commercial traders and the open interest held by certain occupational categories. It is also used to detect market anomalies.

ISS collects and processes daily futures and options position data for large traders from reporting firms (futures commission merchants, clearing members, and foreign brokers) and daily open interest, volume, price and clearing member data from exchanges. This data is further supplemented by collecting and processing related cash market price data from a variety of sources. In addition, identifying information concerning each large trader and reportable account is entered and stored in ISS.

System Input

1. **Data loaded or keyed into the system** - GRS 20, Items 2a(4) and 2b
   
   **Description** - Electronic data files and other paper and electronic inputs loaded or keyed into the system.
   
   **Disposition** - TEMPORARY. Delete when data have been entered into database and verified, or when no longer required to support reconstruction of the database, whichever is later.
   
   **Supersedes** - N1-180-00-1, item 511a

2. **Special Account Identification form 102 and supporting documents**
   
   **Description** - Includes documents not scanned and not uploaded into the system. Data is required by 17 CFR § 17.01 to be submitted to the Commission by a futures commission merchant, clearing member, or foreign broker when a special account is reported for the first time.
   
   **Disposition** - TEMPORARY. Delete when data for an account has not been received for 3 years.
   
   **Supersedes** - N1-180-00-1, item 511b

3. **Statement of Reporting Trader form 40 and supporting documents**
   
   **Description** - Includes documents not scanned and not uploaded into the system. Data is required by 17 CFR § 18.04 to be submitted to the Commission by traders (or their designee) holding reportable positions in response to a special call by the Commission for such documentation.
   
   **Disposition** - TEMPORARY. Delete when data for a trader has not been received for 10 years.
   
   **Supersedes** - N1-180-00-1, item 511b

System Content

4. **Aggregated clearing member position data**
   
   **Description** - Includes electronic data for all futures combined, no individual strike price or expiration months. Data is required by 17 CFR § 16.00 to be submitted to the Commission by the exchanges each business day for each clearing member.
   
   **Disposition** - TEMPORARY. Delete when 5 years old.
   
   **Supersedes** - New Item
5  All other clearing member position data
Description  Includes electronic data required by 17 CFR §16 00 to be submitted to the Commission by the exchanges each business day for each clearing member
Disposition  TEMPORARY  Delete when no less than 6 months old, or when no longer needed for business, but no more than 13 months old
Supersedes  N1-180-00-1, item 516,

6  Trading volume, open contracts, exchanges of futures, prices, critical dates, and cash price data
Description  Includes electronic data required by 17 CFR § 16 01 to be submitted to the Commission by the exchanges each business day
Disposition  TEMPORARY  Delete when 10 years old or when no longer needed, whichever is longer
Supersedes  N1-180-00-1, item 514

7  Large trader positions, deliveries, exchanges of futures, and Exempt Commercial Market (ECM) data
Description  Includes electronic data required by 17 CFR § 17 00 and 17 § 36 3(b)(ii)(A) to be submitted to the Commission by each futures commission merchant, clearing member, and foreign broker each business day
Disposition  TEMPORARY  Delete when 10 years old
Supersedes  N1-180-00-1, item 511c-4

8  Special Account Identification form 102 and supporting documents
Description  Data entered into system from Special Account Identification forms 102, scanned forms 102, and scanned supporting documents Includes documents required by 17 CFR § 17 01 to be submitted to the Commission by a futures commission merchant, clearing member, or foreign broker when a special account is reported for the first time
Disposition  TEMPORARY  Delete when data for an account has not been received for 3 years
Supersedes  N1-180-00-1, items 511c-2 and 511c-3

9  Statement of Reporting Trader form 40 and supporting documents
Description  Data entered into system from Scanned Statement of Reporting Trader forms 40, scanned forms 40, and scanned supporting documents Includes documents required by 17 CFR § 18 04 to be submitted to the Commission by traders (or their designee) holding reportable positions in response to a special call by the Commission for such documentation
Disposition  TEMPORARY  Delete when data for a trader has not been received for 10 years
Supersedes  N1-180-00-1, item 511c-3
10. Data from form 204 and form 304.

Description: Data entered into system from Statement of Cash Positions forms 204 (grains and soybean products) and 304 (cotton). Includes documents required by 17 CFR § 19.01 and 19.02 to be submitted routinely (weekly or monthly) to the Commission by persons holding or controlling certain futures and options positions.

Disposition: TEMPORARY. Destroy/delete when 10 years old.

Supersedes: N1-180-00-1, item 511-c4

11. Owner-level hedge exemption request records.

Description: Data and documents entered into system relating to hedge exemptions at the owner level. Includes documents required by 17 CFR § 1.47 and 1.48 to be submitted to the Commission by persons to engage in hedging.

Disposition: TEMPORARY. Destroy/delete when data for traders under the owner have not been received for 10 years.

Supersedes: New item

12. Trader-level hedge exemption request records.

Description: Data and documents entered into system relating to hedge exemptions at the trader level. Includes documents required by 17 CFR § 1.47 and 1.48 to be submitted to the Commission by persons to engage in hedging.

Disposition: TEMPORARY. Destroy/delete when data for trader has not been received for 10 years.

Supersedes: New item

System Output

Superseded by: DAA-0180-2018-0007-0006

DATE (MM/DD/YYYY): 02/20/2020

43. Market Reports

Description: Reports generated from ISS data including but not limited to: the Commitments of Traders (COT) report and the cotton on-call report.

Disposition: PERMANENT. Cut off annually. Transfer paper records to the National Archives when 20 years old. Pre-accession electronic records to the National archives when 3 years old. Transfer legal custody of electronic records to the National Archives when 20 years old.

Supersedes: Partially superseded N1-180-00-1, item 105

14. Bank Participation Reports

Description: Aggregate large-trader position data of banks participating in various financial and non-financial commodity futures.

Disposition: TEMPORARY. Destroy/delete when 25 months old.

Supersedes: New Item
45 Outputs that support another programmatic function Filing Instruction

Description Outputs, such as printouts or copied, extracted or merged data files generated from ISS that support another programmatic function.

Disposition TEMPORARY Dispose of in accordance with disposition authority that applies to records produced from other programmatic function.

Supersedes New item

46 Ad-hoc outputs GRS 20, items 5 and 16

Description All other outputs, such as printouts or copied, extracted or merged data files used for ad-hoc or one-time inspection, analysis or review, which do not contain substantive information not already included in ISS.

Disposition TEMPORARY Destroy/Delete when no longer needed to conduct business.

Supersedes New item

System Documentation

47 Development documentation GRS 20, item 1a

Description Includes test plans, requirements and specifications, quality assurance procedures, quality guidelines, configuration management plans, detailed design documents, user cases, and other related materials.

Disposition TEMPORARY Destroy/delete 1 year after system is superseded or obsolete.

Supersedes N1-180-00-1, item 511e

48 System monitoring and maintenance documentation GRS 20, item 1c

Description Includes logs created to test system performance and monitor system use.

Disposition TEMPORARY Destroy/delete earliest log entry when log is full.

Supersedes N1-180-00-1, item 511e

49 User manuals, handbooks, and other related documentation GRS 20, item 11a(2)

Disposition PERMANENT Transfer to the National Archives with the permanent electronic records to which the documentation relates.

Supersedes N1-180-00-1, item 511e
SPECIAL CALL RECORDS

Records include information obtained from traders, brokers, or others as part of "special calls" authorized by 17 CFR § 18.01, 18.05, 21.01 and 21.02, and 21.05.

-20. Final Submissions

Disposition: TEMPORARY. Destroy/Delete when 10 years old.

Supersedes: N1-180-00-1, items 511d and 515

Superseded by: DAA-0180-2019-0001-0006

DATE (MM/DD/YYYY): 12/04/2019

21. Draft or Preliminary Submissions

Disposition: TEMPORARY. Destroy/Delete after final submission received.

Supersedes: N1-180-00-1, item 511d and 515

HEDGE EXEMPTION REQUEST RECORDS

Records document the Commission's approval or disapproval of requests from the regulated community to exceed the trading and position limits currently in effect for the purposes of hedging. Requests are submitted to Commission by members of the regulated community in accordance with 17 CFR § 1.47 and 1.48. Records include request letters and responses, and related documentation.

22. Owner-level hedge exemption request records.

Disposition: TEMPORARY. Destroy/delete when data for traders under the owner have not been received for 10 years.

Supersedes: New item

23. Trader-level hedge exemption request records.

Disposition: TEMPORARY. Destroy/delete when data from trader has not been received for 10 years.

Supersedes: New item