

From: [don_alexander](#)
To: [Basel Committee, Service](#)
Subject: Capitalization of bank exposures to central counterparties
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To Whom It May Concern

In reference to the above document, III Proposed reforms (pg 2-3) 9a Qualifying CCPs The clearinghouse should process information that should be independent from the various counterparties The clearing group should have knowledge of the CEM methodology as well as the necessary information. The lack of knowledge about Lehman & AIG and their exposures contributed to the recent financial crisis.

The clearing organization should report this information by the close of day to a regulatory authority. The regulatory agency should then be required to review the information and take any needed action.

regards
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