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A Closer Look at the U.S. NCCBR Market

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The U.S. non-centrally cleared bilateral repurchase agreement (NCCBR) market has $5 trillion in outstanding repos. This market is becoming more transparent to the public due to more data collection. The data show that this market segment has a distinctive mix of collateral and tenor. Compared to the cleared and tri-party segments, NCCBR is the only segment using foreign sovereign bonds ($1.3 trillion) and is the only segment that is predominantly term ($2.7 trillion). The clearing mandate may move $1.5 trillion of NCCBR into the cleared segment, assuming no changes in participant behavior, though most NCCBR will likely remain uncleared due to the use of open term, foreign collateral and the current affiliate exemption.

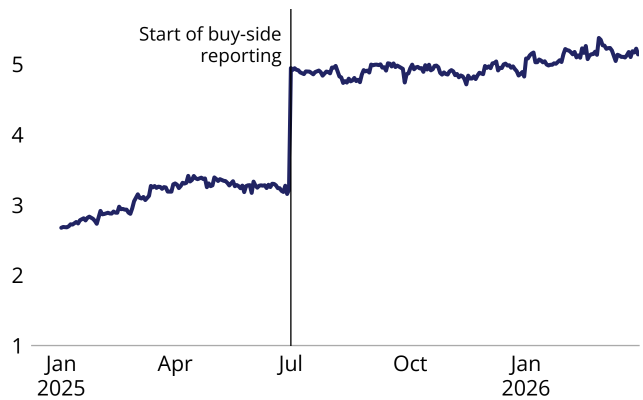
Non-centrally cleared bilateral repos (NCCBR) are repos that are settled without the use of a clearing house or settlement agency. While these utilities have benefits, such as netting and automation, the added costs and limitations are significant enough that many repos remain fully bilateral. Bilateral settlement allows parties to flexibly negotiate a repo's terms, collateral, currency, and haircuts to fit the needs of each deal. As a result, the NCCBR market accommodates a variety of repos, such as those with private sector or foreign collateral, with special terms like optionality, or with market participants that may not have access to clearing infrastructure and thus fill many niches in the financial system.

The Office of Financial Research (OFR) began collecting data on NCCBR transactions in December 2024. This brief uses the data to summarize the NCCBR market by examining market concentration and mapping the bilateral exposure network to show the channels of possible risk transmission. It characterizes the distinctive features of NCCBR transactions that differentiate this market's risk profile from the cleared and tri-party alternatives. Lastly, it gives figures related to the ongoing transition of certain NCCBR to central clearing.

The NCCBR Data

OFR collects daily reports of all outstanding repos and reverse repos on the books of covered reporting entities. The data contain fields such as rate, haircut, start date, end date, counterparty, collateral identifier, cash amount, and securities value. Covered entities are certain types of financial companies that have at least $10 billion in outstanding commitments to borrow via repos. A description of the fields and of the coverage criteria can be found in the Final Rule.[1] The data were cleaned in several ways, including the removal of

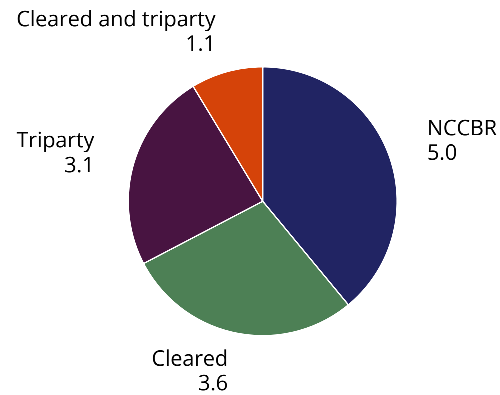
Figure 1. Outstanding Reported NCCBR ($ trillions)



Note: Data are from January 1, 2025, through March 31, 2026.

Sources: Office of Financial Research, Authors' analysis

Figure 2. Repos Outstanding by U.S. Repo Market Segment ($ trillions)



Note: Data are from July 1, 2025, through March 31, 2026. Values are average daily outstanding.

Sources: Office of Financial Research, Bank of New York, Authors' analysis

double-counted repos through use of the counterparty field.[2]

The data were collected in two phases. In the first phase, which started December 2024, OFR collected data from certain sell-side institutions such as securities dealers. In the second phrase, which started July 2025, coverage was expanded to include certain buy-side institutions such as investment advisers. During the first phase, OFR collected data for roughly $3.1 trillion in outstanding NCCBR (**Figure 1**). The second phase included U.S. buy-side repos that were not with existing reporters, including repos with foreign counterparties. After adjusting for double counting of transactions, the buy-side reporting added $1.8 trillion not already reported by existing reporters.

At approximately $5 trillion, the size of the NCCBR segment exceeds OFR's $2.3 trillion estimate from May 2024. NCCBR accounts for about a third of the $12.7 trillion U.S. repo market (**Figure 2**), as also reported in Cenicola et al. (2025).[3]

The NCCBR data are collected directly from reporting financial institutions. Within the NCCBR data are more than 2,500 distinct lenders and borrowers that use more than 30 currencies and more than 65,000 unique security identifiers. These repos are traded manually by chat or phone and on at least seven trading platforms.

Participation in NCCBR

Participant Concentration

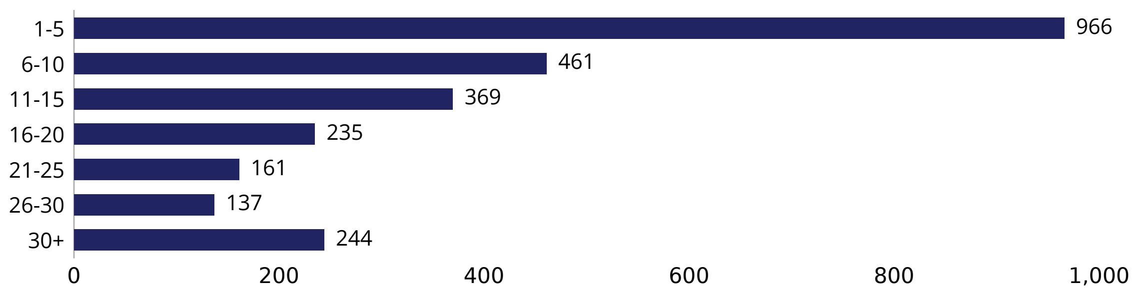
Although more than 2,500 entities are included in the data, most of the transaction volume is from the top 10 entities (**Figure 3**). In fact, the volume of the five largest is greater than the next 10. NCCBR, like many financial markets, is concentrated and dependent on the intermediary role of a few large companies.

Participant Types

Securities dealers often use NCCBR to place cash at end investors. Dealers borrow cash from money funds, usually via tri-party repos. Then, they typically lend the funds to cash seeking institutions, such as asset managers and private funds, via NCCBR (Mann et al. 2024). However, sponsored clearing is emerging as an alternative to Treasury NCCBR as a way for dealers to lend funds, and the clearing mandate will likely increase sponsored volumes.

Accordingly, broker-dealers are the largest participants in NCCBR, with $2.5 trillion in lending and $1.7 trillion in borrowing, underscoring their role as intermediaries in the U.S. repo market (**Figure 4**). Still, the data show that broker-dealers also borrow via NCCBR for other purposes, such as financing inventory or lending securities.

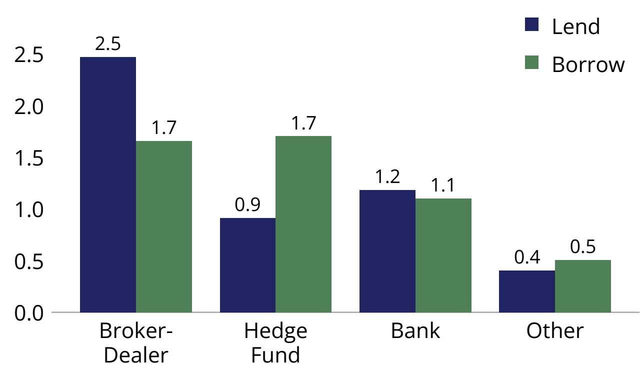
Figure 3. Transaction Volume by Size Bin of the Reporting Financial Company ($ billions)



Note: Data are from July 1, 2025, through March 31, 2026. Reporting companies are assigned to groups based on their average daily volume. Each bar represents the sum of Covered Reporters' average daily volume for all reporters in that group. In this graph only, volumes are double-counted, as the volumes are computed by reporting financial company.

Sources: Office of Financial Research, Authors' analysis

Figure 4. NCCBR Outstanding by Side and Counterparty Type ($ trillions)



Note: Data are from July 1, 2025, through March 31, 2026. Values are average daily outstanding.

Sources: Office of Financial Research, Authors' analysis

Banks are also active in NCCBR, with $1.1 trillion in borrowing and $1.2 trillion in lending. Along with broker-dealers, banks use NCCBR to lend cash to end investors, such as hedge funds, and to lend to other banks and dealers (**Figure 5**). Banks likely use NCCBR for many purposes, such as managing payment flows or shorting bonds for duration management.

Hedge funds are a large category of end investors that obtain funding through NCCBR. Hedge funds often use repo to help finance leveraged positions. They borrow $1.7 trillion via NCCBR (gross) and are net borrowers in this market. At the same time, hedge funds also use repos to obtain specific securities, which, in part, accounts for their $0.9 trillion in reverse repos outstanding. Lastly, the "other" participants category includes government-sponsored enterprises, mutual funds, and exchange traded funds. In aggregate, their lending and borrowing activities are balanced at roughly $0.5 trillion in borrowing and in lending.

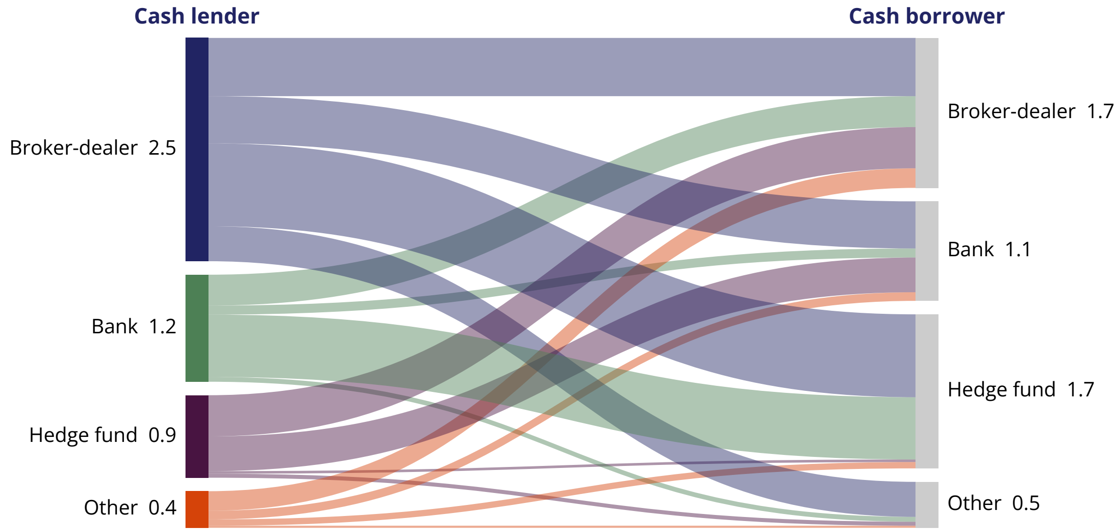
Foreign Participation

A new finding from OFR's NCCBR data collection is that U.S. companies frequently enter repos with counterparties legally domiciled outside the United States. In fact, 53% of outstanding NCCBR, or about $2.6 trillion, is cross-border (**Figure 6**). While foreign participation in U.S. repo markets enhances market liquidity, cross-border repos may also propagate underlying financial stability vulnerabilities internationally. The amount of NCCBR lending to and borrowing from abroad is roughly balanced.[4]

The financial companies entering cross-border NCCBR include all types, although most of the NCCBR are among banks, broker-dealers, and hedge funds (**Figure 7**). Many foreign broker-dealers are affiliates of domestic broker-dealers (Cenicola et al. 2026). This chart is for NCCBR only, whereas Friedrichs et al. (2026) finds total cross-border lending exceeds $4 trillion.

A majority of the funding flow out of the United States is from domestic broker-dealers, whereas most of the

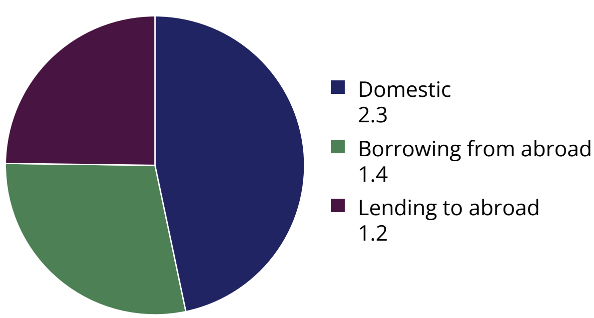
Figure 5. NCCBR Outstanding by Counterparty Types ($ trillions)



Note: Data are from July 1, 2025, through March 31, 2026. Values are average daily outstanding.

Sources: Office of Financial Research, Authors' analysis

Figure 6. NCCBR Outstanding by Counterparty Domicile ($ trillions)



Note: Data are from July 1, 2025, through March 31, 2026. Values are average daily outstanding.

Sources: Office of Financial Research, Authors' analysis

funding flow into the United States goes to hedge funds. This suggests the typical NCCBR use case for foreign borrowers probably differs from that of domestic borrowers. Since foreign entities borrow from dealers, they could be obtaining temporary dollar funding to finance assets denominated in U.S. dollars (USD). In contrast, the use case for domestic borrowers could be leverage as these tend to be hedge funds.[5]

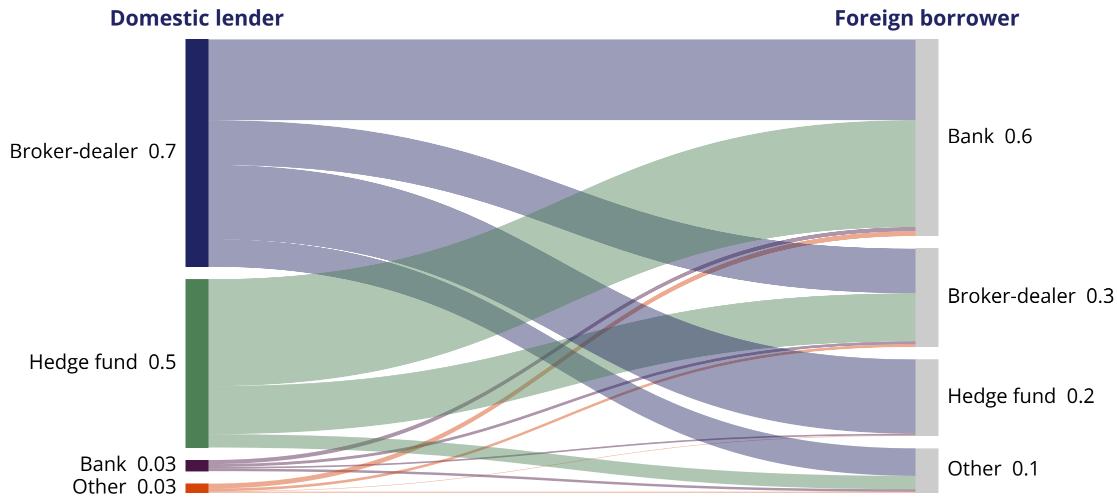
In addition to cross-border repos, there are also non-USD repos. There is considerable overlap in the two groups. NCCBR is currently the only market segment in which U.S. institutions can enter non-USD repos. Fixed Income Clearing Corporation (FICC) does not clear non-USD repos, and BNY Triparty operates in U.S. dollars. Accordingly, about a quarter of NCCBR outstanding is in a foreign currency, and most is cross-border (**Figure 8**). Most of the non-USD outstanding are denominated in euro, pound sterling, and yen, making NCCBR a material channel for sourcing foreign currency and managing cross-border liquidity.

Characteristics of NCCBR

Collateral

The collateral used in the NCCBR segment spans U.S. Treasuries, U.S. agency-issued securities, sovereign bonds, corporate debt, structured products, municipal debt, and corporate equity. This range contrasts the centrally cleared segment, which is limited to Fedwire-eligible collateral, such as Treasuries and agencies. Al-

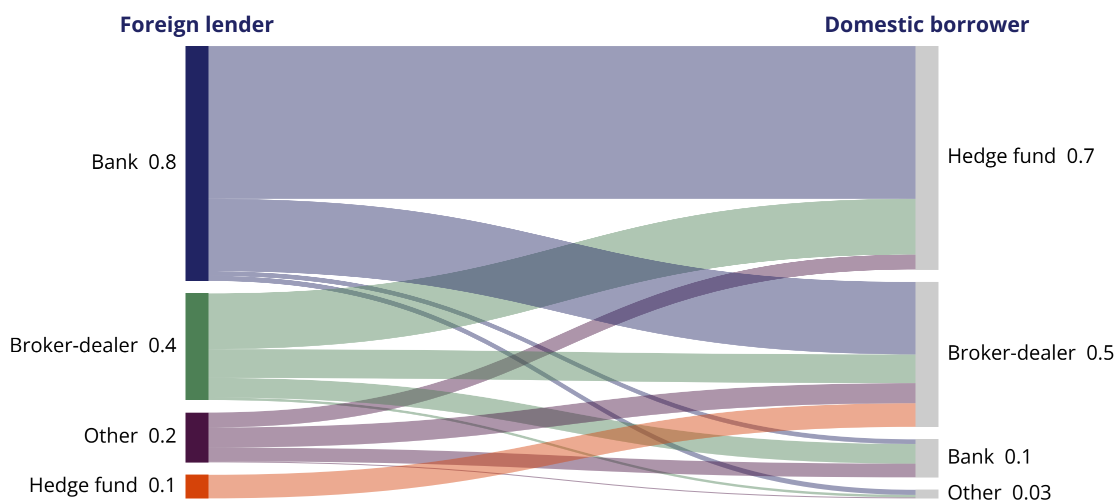
Figure 7.A. NCCBR Outstanding Between Domestic Lenders and Foreign Borrowers by Counterparty Types ($ trillions)



Note: Data are from July 1, 2025, through March 31, 2026. Values are average daily outstanding.

Sources: Office of Financial Research, Authors' analysis

Figure 7.B. NCCBR Outstanding Between Foreign Lenders and Domestic Borrowers by Counterparty Types ($ trillions)

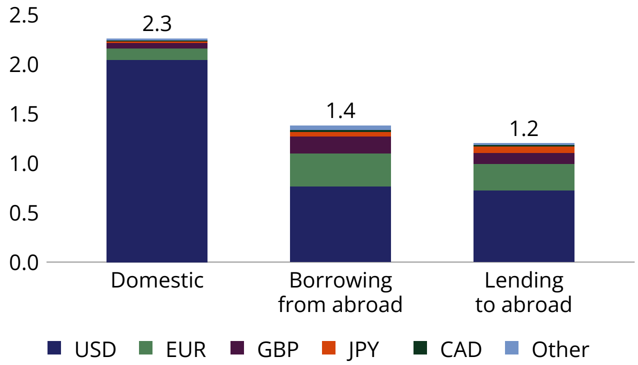


Note: Data are from July 1, 2025, through March 31, 2026. Values are average daily outstanding.

Sources: Office of Financial Research, Authors' analysis

though the tri-party segment permits a wider range of collateral, most tri-party repos are backed by Treasuries and agencies because tri-party lenders prefer safe assets. Thus, in practice, NCCBR is the main venue in which private-sector collateral is used, making NCCBR the segment to track rates and haircuts on this collateral.

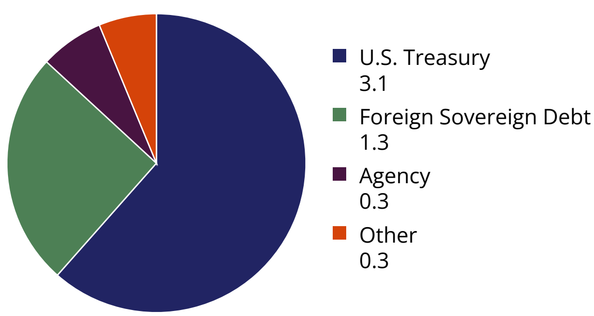
Figure 8. NCCBR Outstanding by Counterparty Domicile and Currency ($ trillions)



Note: Data are from July 1, 2025, through March 31, 2026. Values are average daily outstanding.

Sources: Office of Financial Research, Authors' analysis

Figure 9. NCCBR Outstanding by Collateral Type ($ trillions)



Note: Data are from July 1, 2025, through March 31, 2026. Values are average daily outstanding.

Sources: Office of Financial Research, Authors' analysis

Treasuries still represent the largest share of NCCBR collateral, accounting for 62% of outstanding (**Figure 9**). This amounts to $3.1 trillion and underscores the importance of NCCBR in supporting Treasury market liquidity. The second most common type of collateral is foreign sovereign bonds, backing 25% of NCCBR outstanding. This corresponds with the previous section's findings on foreign participation in NCCBR. In fact, the denomination of collateral often

Figure 10. The Repo Rate Waterfall (basis points)

Rate spread to SOFR, overnight Treasury-collateralized repos

Segment	Rate Spread to SOFR (bps)
Sponsored DVP Service (sponsored lending)	-5.0
Tri-Party	-2.5
Sponsored GC Service	-1.8
NCCBR	-1.2
DVP Service	0.4
GCF Service	4.0
NCCBR excluding specials	5.0
Sponsored DVP Service (sponsored borrowing)	6.9

Note: Data are from July 1, 2025, through March 31, 2026. The tri-party value is the average daily tri-party general collateral rate (TGCR) spread to SOFR over the sample period. All other values are the daily weighted average rate spread to SOFR on overnight USD repos backed by U.S. Treasuries, averaged across the sample period. Repos that span Federal Reserve rate decision days or corporate tax payment days are removed from all segments except tri-party. For the NCCBR excluding specials value, 20% of the lowest rate volume is removed for each day in the sample period.

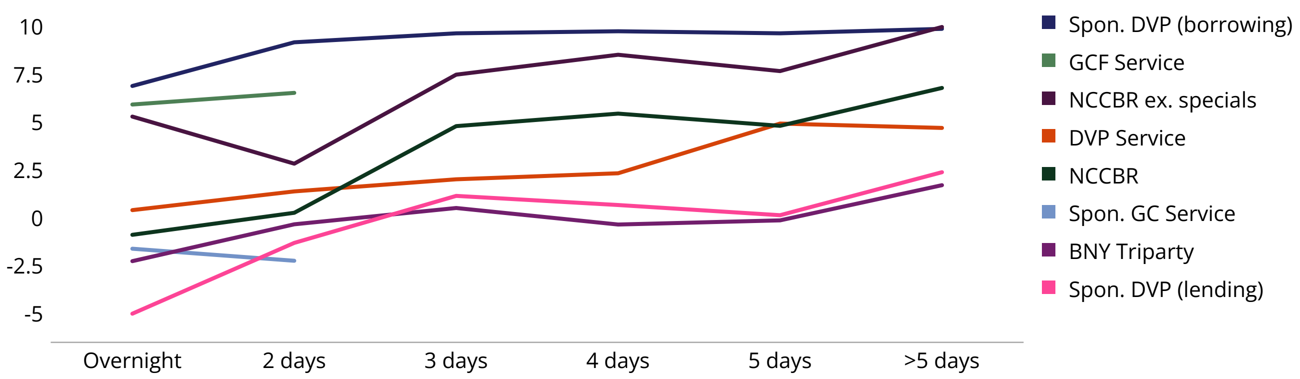
Sources: Office of Financial Research, Federal Reserve Bank of New York, Authors' analysis

matches the currency of the cash exchanged (over 99% of NCCBR outstanding). Given that about a quarter of NCCBR outstanding is denominated in a foreign currency, it follows that a similar share would be collateralized by foreign sovereign bonds.

Rates

The prevailing rate in a repo segment reflects whether the repo is generally a source of funding or a destination for it. Cash flows through the repo market in a "waterfall," cascading from lower-rate segments in which dealers borrow to higher-rate segments in which they lend. The rate spread across two segments creates a bid-ask spread that dealers can earn for channeling funding from one segment to another.

Figure 11. Term Repo Rate Spreads (basis points)
Overnight SOFR spread



Note: Data are from July 1, 2025, through March 31, 2026. Values are the daily weighted average rate spread to SOFR on USD repos backed by U.S. Treasuries or U.S. agency-issued securities averaged across the sample period. Repos that span Federal Reserve rate decision days or corporate tax payment days are removed. For NCCBR excluding specials values, 20% of the lowest-rate volume is removed from each tenor bin for each day in the sample period. Values for GCF Service and Sponsored GC Service exceeding two days are excluded as activity in these markets is predominantly concentrated in short tenors.

Sources: Office of Financial Research, Federal Reserve Bank of New York, Authors' analysis

Repo Terminology

A **general-collateral repo** (or GC repo) is a repo for which the collateral can be any security that meets predefined eligibility criteria.

A **specific repo** is a repo for which the collateral must be a named security.

A **special repo** is a specific repo for which the rate is materially below the prevailing GC rate because there is high demand to borrow the security. Special repos are often called specials, and the collateral is said to be on special.

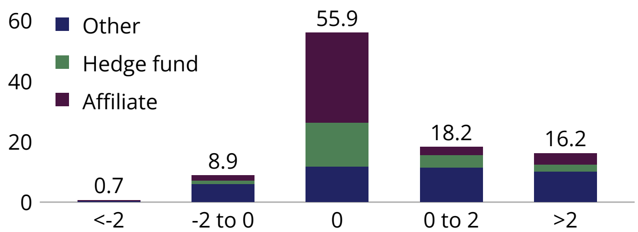
NCCBR might appear to have lower rates if specials are included (see above box). On average, rates for overnight NCCBR backed by Treasury collateral are 1.2 basis points below SOFR, which would position this segment in the middle of the market. However, this aggregate rate includes the rates for special repos, which do not reflect funding conditions. When using the SOFR methodology to exclude specials, rates for overnight Treasury-backed NCCBR average 5.0 basis points above SOFR.[6]

In equilibrium, dealers borrow from segments with low rates and lend in segments with high rates (**Figure 10**). These same low-rate segments are entry points into the system for cash, while the high-rate segments are where cash exits. Rates in sponsored lending, tri-party, and the Sponsored GC Service are lower than the SOFR average. These segments are entry points for cash into repo markets from money market funds. Then, funding circulates among intermediaries, typically via the DVP Service, at rates close to the average at 0.4 basis points above SOFR. Lastly, funding exits the system to end investors in segments such as NCCBR excluding specials at 5.0 basis points above SOFR and sponsored borrowing (via the Sponsored DVP Service) at 6.9 basis points above SOFR.[7]

NCCBR has higher rates in part because lenders are exposed to the credit risk of borrowers without the guarantee of a central counterparty (CCP), and riskier borrowers tend to participate in NCCBR (similarly, in the Sponsored Service, the Sponsoring Member is also on the hook for the Sponsored Member's performance). NCCBR may also use bespoke terms and maturity structures that carry a rate premium.

The rank ordering of repo segments by rate is mostly preserved through the term structure but with considerable noise, which is unavoidable for a market with such varied counterparties. In looking at the rates for repo segments with terms from overnight to over five days, rates generally increase with term, showing a term premium, and one that generally preserves the ordering

Figure 12. NCCBR Haircut Distribution by Broker-Dealer Counterparty (percent)
Share of broker-dealer repo outstanding



Note: Data are from January 2, 2025, through May 30, 2025. Haircuts are the percentage value of collateral provided in excess of cash lent. Each bar represents the average daily share of outstanding repo associated with the haircut bin indicated on the x-axis.

Sources: Office of Financial Research; Cenicola, Mann and Paddrik (2025)

of segments from lower-rate to higher-rate (**Figure 11**). Through the five-day term structure, tri-party and sponsored lending remain cheaper, DVP remains in the middle, and sponsored borrowing and NCCBR excluding specials remain richer. Dealers that borrow in tri-party or via sponsored borrowing can, therefore, earn additional premium by lending at a longer term than they borrow. However, this involves maturity transformation, which could become a vulnerability if short term funding became unavailable.[8]

Haircuts

The NCCBR market operates with more flexible margin arrangements than those in other repo markets. While cleared repos use FICC's margining framework, which is quantitative and portfolio-based, and tri-party repos draw haircuts in part from predefined eligible collateral schedules, parties to NCCBR can instead negotiate haircuts based on the context of individual deals.

Cenicola et al. (2025) found that 56% of broker-dealers' repos carried a zero haircut (**Figure 12**). However, an observed zero haircut is not necessarily a sign of poor risk management. About half of these NCCBR with zero haircuts were between affiliated entities. These may reflect internal cash transfers that do not pose the usual sort of credit risk and may not require margin depending on the institutional arrangement. Of the NCCBR between arm's length counterparties (non-affiliates), about half involved hedge funds. Hedge funds often pair repo positions with other financial instruments and post to the prime broker a margin on the portfolio rather than on each individual position in the portfolio, which is a practice not visible in transaction-level repo data. Still, about 21% of broker-dealers' zero-haircut NCCBR are not explained by being with affiliates or by being with a hedge fund.

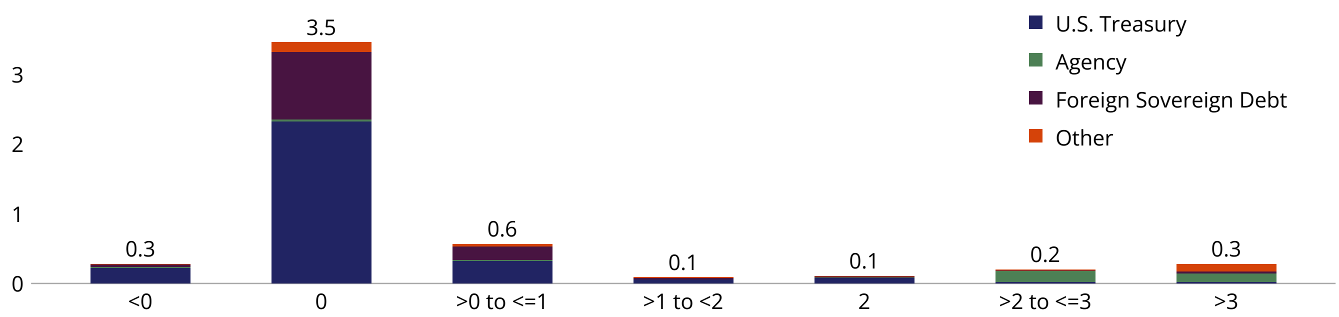
NCCBR counterparties use smaller haircuts for collateral that is more liquid and larger haircuts for less-liquid collateral. Haircuts for U.S. Treasury collateral are generally 2% and below (**Figure 13**). There is a cluster at 2%. Foreign sovereign debt similarly takes haircuts of 1% and below. In contrast, agencies take haircuts greater than 2%, and the other collateral grouping (including corporate bonds, equities, and structured products) takes a variety of haircuts that are often zero but often greater than 3%.

Tenor

Another distinguishing mark of NCCBR is that it has a longer tenor than other segments. Here, tenor is defined as the term to maturity on the start-leg date. In the cleared segment, the incentive to net with the central counterparty can attract terms to the overnight tenor at which most nettable repos mature. Similarly, in tri-party, the institutional preferences and regulation of money market funds both favor overnight tenor. As such, many repos in DVP and tri-party are overnight. But similar incentives do not exist for NCCBR in the same way, and this segment sees longer tenors.

The higher prevalence of term repo in NCCBR is evident in the turnover ratio of outstanding to volume (**Figure 14**). Even though NCCBR is the largest repo market by outstanding, more volume settles daily in DVP and tri-party than in NCCBR. In fact, settlement volume constitutes less than 40% of NCCBR outstanding in that under two-fifths of the outstanding turn over each day. In contrast, in DVP and tri-party, turnover is significantly larger at 81% and 74%, respectively. GCF is closer to NCCBR because of its low turnover ratio, though this segment represents a small share of the repo market.

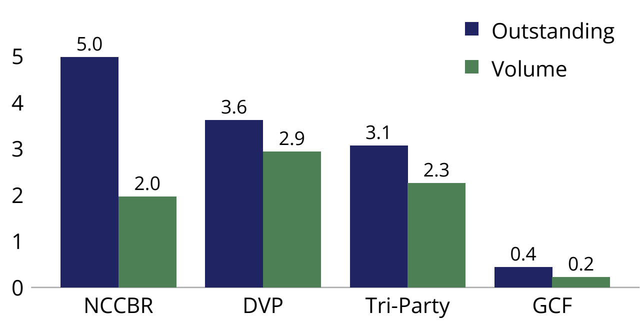
Figure 13. NCCBR Outstanding by Haircut and Collateral Type ($ trillions)



Note: Data are from July 1, 2025, through March 31, 2026. Values are average daily outstanding. Haircuts are percentage value of collateral provided in excess of cash lent.

Sources: Office of Financial Research, Authors' analysis

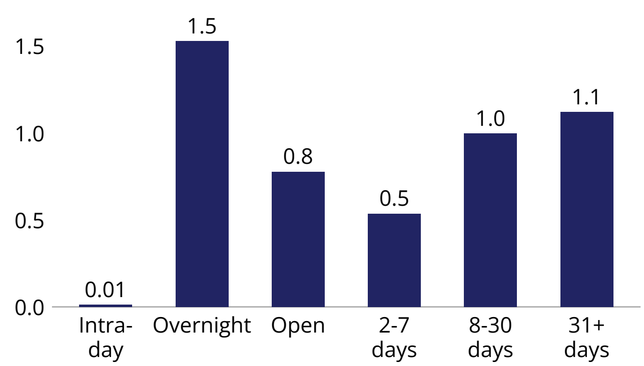
Figure 14. Outstanding Versus Volume by Segment ($ trillions)



Note: Data are from July 1, 2025, through March 31, 2026. Values are average daily outstanding and average daily transaction volume. Sponsored GC Service is not included.

Sources: Office of Financial Research, Bank of New York, Authors' analysis

Figure 15. NCCBR Outstanding by Tenor ($ trillions)



Note: Data are from July 1, 2025, through March 31, 2026. Values are average daily outstanding.

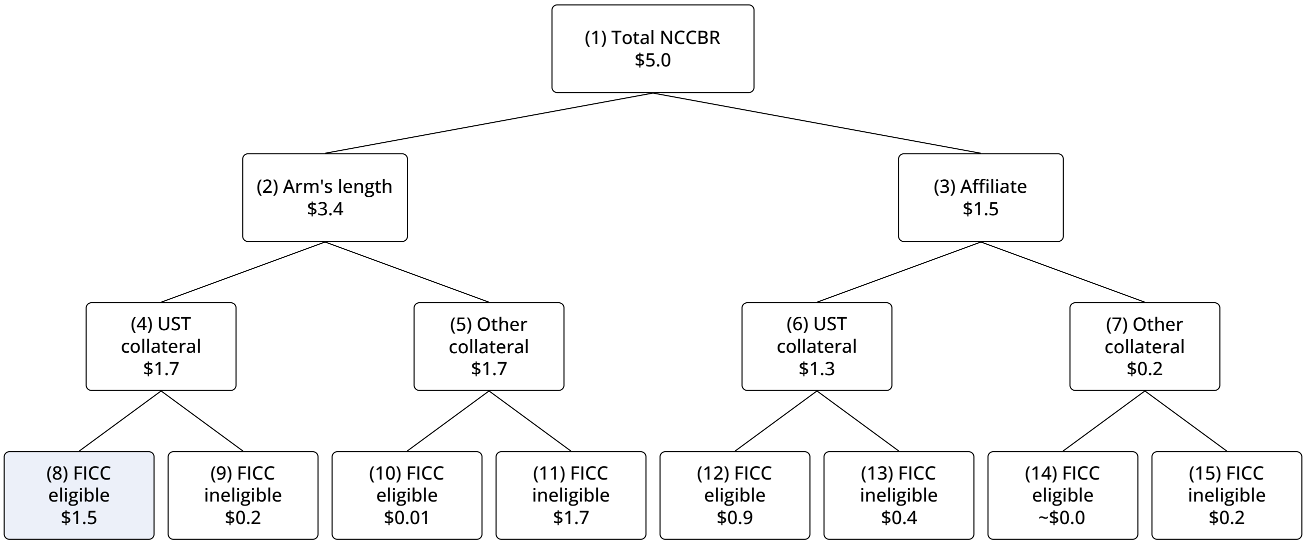
Sources: Office of Financial Research, Authors' analysis

The data confirm that longer-term repos are prevalent in NCCBR. A majority, or $2.65 trillion outstanding, had a tenor other than open or overnight. More than 40% of NCCBR outstanding, or $2.1 trillion, had a tenor beyond one week (**Figure 15**). In fact, $1.1 trillion outstanding has tenors exceeding 30 days. Overnight repos make up just 31% of NCCBR outstanding while, in DVP, overnight repo outstanding is around 80%. Since many dealers fund overnight, the long-term lending in NCCBR would represent maturity transformation.

Central Clearing and the Future of NCCBR

The Securities and Exchange Commission (SEC) will require members of covered clearing agencies to centrally clear their Treasury-backed repos by June 2027. Clearing agencies become the central counterparty for cleared trades, centralizing the default-risk network in a financial market and potentially lowering systemic risk in some cases. OFR's NCCBR data provide an opportunity to estimate the portion of the non-centrally

Figure 16. Decomposition of NCCBR Outstanding by Affiliation, Collateral, and Clearing Eligibility ($ trillions)



Note: Data are from July 1, 2025, through March 31, 2026. Values are average daily outstanding. FICC eligible refers to repo that would be eligible for central clearing in FICC's DVP Service.

Sources: Office of Financial Research, Authors' analysis

cleared market that could move to central clearing (Glasserman, Moallemi and Yuan 2016).[9]

The mandate only covers Treasury-backed repos and has exceptions. Affiliated entities can choose not to clear under certain conditions, and the rule exempts repos that cannot be cleared at any covered clearing house.[10] As of Q2 2026, FICC is the only repo clearing house operating in the U.S. and does not clear foreign-currency repos, intraday repos, or repos with embedded optionality.[11] As a result, of the roughly $5 trillion in outstanding NCCBR, the exceptions would leave $1.5 trillion outstanding that is covered by the mandate (see **Figure 16, cell 8**). This analysis assumes *ceteris paribus* (no changes in behavior).

Around $3.2 trillion of NCCBR are currently outside the scope of the central clearing rule. These include repos for non-Treasury collateral and affiliate repos, both of which are common in NCCBR. Of the out-of-scope repos, roughly $1.7 trillion were collateralized by non-Treasury securities, $1.3 trillion were affiliate repos, and $0.2 trillion were both (see **cells 5, 6, and 7**, respectively).[12]

Assuming *ceteris paribus*, the NCCBR outstanding could remain large even after the central-clearing mandate given the share of repos that fall outside the scope of the rule, plus the additional repos that are within scope but not eligible for central clearing (see **cell 9**). Together, these account for around 70% of the segment. Note that participants might choose to centrally clear repos that are not within the rule's scope. For example, a dealer might clear out-of-scope repos to take advantage of netting. Out-of-scope repos that could be voluntarily centrally cleared total almost $1 trillion (see **cells 10, 12, and 14**).

For more on the impact of clearing on U.S. repo markets, see Cenicola et al. (2026).

Conclusion

OFR's new NCCBR data collection reveals a $5 trillion market segment for repos that do not use standardized clearing or settlement utilities, such as central clearing houses and third-party settlement agencies. NCCBR fills a liquidity niche by allowing more customized arrangements between counterparties, like more flexible terms, currencies, and collateral that, among other things, enables cross-border repos. This flexibility can also introduce channels of risk. For example, the NC-

CBR market is concentrated in a handful of large intermediaries and may serve as a conduit for cross-border shocks. The upcoming central clearing mandate may address some of these concerns by moving an estimated $1.5 trillion in repos backed by Treasuries to central clearing, though about 70% of NCCBR activity is likely to remain bilateral due to affiliate relationships, non-Treasury collateral, or operational characteristics that make central clearing infeasible. As such, continued monitoring of this previously opaque market segment remains essential for identifying emerging risks and understanding potential channels of financial contagion in the broader U.S. financial system.

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Endnotes

1 Ongoing Data Collection of Non-Centrally Cleared Bilateral Transactions in the U.S. Repurchase Agreement Market, 89 Fed. Reg. 37091 (May 6, 2024). https://www.federalregister.gov/documents/2024/05/06/2024-08999/ongoing-data-collection-of-non-centrally-cleared-bilateral-transactions-in-the-us-repurchase

2 Repos between two reporting parties would be double counted in aggregates. To single-count the repos, one reporting party's records are retained, and records from other parties that report as the counterparty, guarantor or parent to the reporting party are dropped. The party whose repos are retained is selected based on principal status, dealer role, and past data quality. Any reported cash or securities values that are denominated in a foreign currency are converted to USD at the daily FX rate. Adjustments are made to haircuts and par values reported by companies that consistently report these in an idiosyncratic unit of account. Outlier values are dropped.

3 See preamble to 89 Fed. Reg. 37091 above. See also Hempel et al. (2023).

4 For analysis on how shocks propagate through repo markets, see Kahn et al. (2023).

5 For example, hedge funds could be entering a cash-futures basis trade for a foreign sovereign bond (see Barth and Kahn 2025 for the case of Treasuries).

6 To use a common specials methodology, the results use the "SOFR trim" and remove the bottom 20% of repo volume by rate.

7 Rates from the "destination" markets such as NCCBR excluding specials are further from SOFR than rates from the "source" markets, such as tri-party, because SOFR does not include NCCBR data in its average. GCF repos, trading at 4.0 basis points above SOFR, serve a somewhat distinct function as an overnight balancing mechanism. Among other things, GCF repos can provide an out for dealers that are caught short later in the repo trading session.

8 Sponsored GC and GCF repo do not see enough repos at longer terms for OFR to disclose the rates.

9 The central clearing rule applies only to members of covered clearing agencies (CCAs). As of May 2026, the rule will likely encompass the repos of many nonmembers. Most NCCBR captured by OFR's collection involves either a CCA direct member or a CCA member affiliate. While eligible Treasury repos between CCA member affiliates and their clients may not formally fall within the scope of mandated central clearing, currently, they would have to be centrally cleared if CCA members take advantage of the affiliate exemption provided by the rule. As such, this analysis does not restrict the subset of repos that fall within scope of the rule to just those involving a direct member of a CCA.

10 As of May 2026, the affiliate exemption applies only if the affiliate centrally clears all other eligible Treasury repos. This analysis assumes that participants take advantage of the affiliate exemption and adhere to the condition. The SEC is evaluating requests for exemptive relief to certain affiliate repos (see Notice of Request for Exemptive Relief Pursuant to Section 36(a) of the Securities Exchange Act of 1934, 91 Fed. Reg. 12903; https://www.federalregister.gov/documents/2026/03/11/2026-04781/notice-of-request-for-exemptive-relief-pursuant-to-section-36a-of-the-securities-exchange-act-of). Also, while not accounted for in this analysis, the rule provides additional exemptions for specific counterparties such as international financial institutions, natural persons, state/local governments, and other clearing organizations.

11 If another CCA were to enter the market and offer to clear such repos, they could fall within scope of the central clearing rule.

12 See "Collateral" section. For tri-party affiliate repos, see Friedrichs et al. (2025).