

December 17, 2010

Elizabeth M. Murphy
Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-1090

Re: File Number SR-FICC-2010-09

Dear Ms. Secretary:

Goldman, Sachs & Co. (“Goldman Sachs”) respectfully submits this letter in support of the proposed rule change filed by Fixed Income Clearing Corporation (“FICC”) that would allow FICC to offer cross-margining of certain positions cleared at its Government Securities Division (“GSD”) and certain positions cleared at New York Portfolio Clearing, LLC (“NYPC”).

Goldman Sachs is a wholly-owned subsidiary of The Goldman Sachs Group, Inc. (“GS Group”). GS Group is a global investment banking and securities firm that engages in investment banking, securities, investment management and other financial services primarily with institutional clients. GS Group is a financial holding company regulated by the Federal Reserve Board, and its wholly-owned subsidiaries, Goldman Sachs and Goldman Sachs Execution & Clearing, L.P., are both registered with the CFTC as futures commission merchants and with the SEC as broker-dealers.

Through its affiliates, GS Group is a member of various exchanges and clearinghouses and has long been a vocal proponent of competition in execution and clearing. Competition encourages innovation and efficiencies, drives down costs and provides end users with improved choices. Such benefits can result from FICC’s proposed rule change.

FICC’s proposed rule change would permit “single pot” margining for both interest rate futures contracts, initially those traded on NYSE Liffe US¹ and cash government securities cleared at FICC for firms that are members of both NYPC and FICC. The creation of “single pot” margining will be an important development for the US financial markets given the cash flow and margin efficiencies that will become available to all end-users, and importantly will help

¹ Goldman Sachs is a minority owner in NYSE Liffe US.

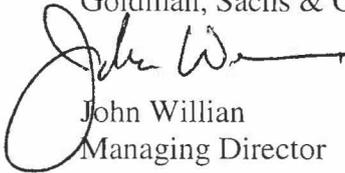
encourage an increased use of centralized clearing which is a key element of the Dodd-Frank legislation.

Moreover, unlike traditional vertical clearinghouses, NYPC will provide “open access” clearing of interest rate futures contracts to any qualified exchange or execution platform that wishes to connect to the clearinghouse. Allowing multiple execution venues to connect to the same clearinghouse is consistent with the goal of developing greater competition at the exchange or execution level, and will benefit end users by offering a choice of execution platforms without sacrificing the benefits of centralized clearing.

Accordingly, we encourage the Commission to approve FICC’s proposed rule change.

Sincerely,

Goldman, Sachs & Co.

A handwritten signature in black ink, appearing to read "John Willian", with a large, stylized initial "J" and a horizontal line extending to the right.

John Willian
Managing Director