

**SUBMISSION COVER SHEET**

**IMPORTANT:** Check box if Confidential Treatment is requested

Registered Entity Identifier Code (optional): 21-137

Organization: The Board of Trade of the City of Chicago, Inc. ("CBOT")

Filing as a:  DCM  SEF  DCO  SDR

Please note - only ONE choice allowed.

Filing Date (mm/dd/yy): March 17, 2021 Filing Description: Modifications to the Eris Swap Futures Market Maker Program

**SPECIFY FILING TYPE**

Please note only ONE choice allowed per Submission.

**Organization Rules and Rule Amendments**

- |                                     |                                     |            |
|-------------------------------------|-------------------------------------|------------|
| <input checked="" type="checkbox"/> | Certification                       | § 40.6(a)  |
| <input type="checkbox"/>            | Approval                            | § 40.5(a)  |
| <input type="checkbox"/>            | Notification                        | § 40.6(d)  |
| <input type="checkbox"/>            | Advance Notice of SIDCO Rule Change | § 40.10(a) |
| <input type="checkbox"/>            | SIDCO Emergency Rule Change         | § 40.10(h) |

Rule Numbers: Not Applicable

**New Product**

Please note only ONE product per Submission.

- |                          |                                       |            |
|--------------------------|---------------------------------------|------------|
| <input type="checkbox"/> | Certification                         | § 40.2(a)  |
| <input type="checkbox"/> | Certification Security Futures        | § 41.23(a) |
| <input type="checkbox"/> | Certification Swap Class              | § 40.2(d)  |
| <input type="checkbox"/> | Approval                              | § 40.3(a)  |
| <input type="checkbox"/> | Approval Security Futures             | § 41.23(b) |
| <input type="checkbox"/> | Novel Derivative Product Notification | § 40.12(a) |
| <input type="checkbox"/> | Swap Submission                       | § 39.5     |

Official Product Name:

**Product Terms and Conditions (product related Rules and Rule Amendments)**

- |                          |                                                         |                      |
|--------------------------|---------------------------------------------------------|----------------------|
| <input type="checkbox"/> | Certification                                           | § 40.6(a)            |
| <input type="checkbox"/> | Certification Made Available to Trade Determination     | § 40.6(a)            |
| <input type="checkbox"/> | Certification Security Futures                          | § 41.24(a)           |
| <input type="checkbox"/> | Delisting (No Open Interest)                            | § 40.6(a)            |
| <input type="checkbox"/> | Approval                                                | § 40.5(a)            |
| <input type="checkbox"/> | Approval Made Available to Trade Determination          | § 40.5(a)            |
| <input type="checkbox"/> | Approval Security Futures                               | § 41.24(c)           |
| <input type="checkbox"/> | Approval Amendments to enumerated agricultural products | § 40.4(a), § 40.5(a) |
| <input type="checkbox"/> | “Non-Material Agricultural Rule Change”                 | § 40.4(b)(5)         |
| <input type="checkbox"/> | Notification                                            | § 40.6(d)            |

Official Name(s) of Product(s) Affected:

Rule Numbers:



Christopher Bowen  
Managing Director and Chief Regulatory Counsel  
Legal Department

March 17, 2021

**VIA ELECTRONIC PORTAL**

Christopher J. Kirkpatrick  
Office of the Secretariat  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, D.C. 20581

**RE: Modifications to the Eris Swap Futures Market Maker Program  
CBOT Submission No. 21-137**

Dear Mr. Kirkpatrick:

The Board of Trade of the City of Chicago, Inc. ("CBOT" or "Exchange") hereby notifies the Commodity Futures Trading Commission ("CFTC" or "Commission") of plans to modify the Eris Swap Futures Market Maker Program ("Program"). The modifications to the Program will become effective on April 1, 2021.

Exhibit 1 sets forth the terms of this Program. Modifications appear below, with additions underlined and deletions ~~overstruck~~.

The Exchange reviewed the designated contract market core principles ("Core Principles") as set forth in the Commodity Exchange Act ("CEA" or "Act"). During the review, CBOT staff identified the following Core Principles as potentially being impacted: Monitoring of Trading, Execution of Transactions, Protection of Market Participants, Compliance with Rules, and Recordkeeping.

The Program does not impact the Exchange's ability to perform its trade practice and market surveillance obligations under the CEA and the Exchange's market regulation staff will monitor trading in the Program's products to prevent manipulative trading and market abuse. Additionally, the Exchange has implemented systems to track Program participants' obligations to ensure proper distribution of earned incentives. The incentives in the Program do not impact the Exchange's order execution. Participants in the Program will be selected by Exchange staff using criteria as further stated in Exhibit 1. Chapter 4 of the CBOT rules includes prohibitions against fraudulent, non-competitive, unfair or abusive practices. All participants must execute a contractual agreement with the Exchange in which each participant will expressly agree to comply with and be subject to applicable regulations and CBOT rules. The Program is subject to the Exchange's record retention policies which comply with the CEA.

CBOT certifies that the Program complies with the CEA and the regulations thereunder. There were no substantive opposing views to this Program.

The Exchange certifies that this submission has been concurrently posted on the Exchange's website at <http://www.cmegroup.com/market-regulation/rule-filings.html>.

If you require any additional information regarding this submission, please e-mail [CMEGSubmissionInquiry@cmegroup.com](mailto:CMEGSubmissionInquiry@cmegroup.com) or contact Rachel Johnson at 312-466-4393 or via e-mail at [Rachel.Johnson@cmegroup.com](mailto:Rachel.Johnson@cmegroup.com). Please reference our CBOT Submission No. 21-137 in any related correspondence.

Sincerely,

/s/ Christopher Bowen  
Managing Director and Chief Regulatory Counsel

Attachment: Exhibit 1

# EXHIBIT 1

## Eris Swap Futures Market Maker Program

### Program Purpose

The purpose of this Program is to incent participants to build liquidity in the Products listed below. The resulting increase in central limit order book liquidity on the CME Globex® Platform ("Globex") benefits all participant segments in the market.

### Product Scope

2-Year Eris Swap Futures ("LIT"), 3-Year Eris Swap Futures ("LIC"), 4-Year Eris Swap Futures ("LID"), 5-Year Eris Swap Futures ("LIW"), 7-Year Eris Swap Futures ("LIB"), 10-Year Eris Swap Futures ("LIY"), 12-Year Eris Swap Futures ("LII"), 15-Year Eris Swap Futures ("LIL"), 20-Year Eris Swap Futures ("LIO"), 30-Year Eris Swap Futures ("LIE"), 1-Year Eris SOFR Swap Futures ("YIA"), 2-Year Eris SOFR Swap Futures ("YIT"), 3-Year Eris SOFR Swap Futures ("YIC"), 4-Year Eris SOFR Swap Futures ("YID"), 5-Year Eris SOFR Swap Futures ("YIW"), 7-Year Eris SOFR Swap Futures ("YIB"), 10-Year Eris SOFR Swap Futures ("YIY"), 12-Year Eris SOFR Swap Futures ("YII"), 15-Year Eris SOFR Swap Futures ("YIL"), 20-Year Eris SOFR Swap Futures ("YIO"), and 30-Year Eris SOFR Swap Futures ("YIE") (collectively, the "Products").

### Eligible Participants

There is no limit to the number of participants that may participate in the Program. Participants may be CBOT members or non-members. Participants may not be enrolled in the International Incentive Program or International Cross-Asset Volume Incentive Program. Participants must have either: (i) an average daily volume ("ADV") of at least 50 in the Products on Globex for one (1) full calendar month within six (6) months of entering the Program, or (ii) demonstrated the ability to meet quoting obligations in the Exchanges' interest rates programs within the previous twelve (12) months prior to entering the Program.

### Program Term

Start date is February 1, 2020. End date is ~~March 31, 2021~~ September 30, 2021.

### Hours

Regular Trading Hours ("RTH"), 7:00AM – 4:00PM CT.

### Obligations

Minimum Quoting Obligations: In order to be eligible to receive certain incentives, ~~the incentives for Tier A, Tier B, or Quoting Incentives for Tier C,~~ participants must quote two-sided markets in the Products on Globex at designated bid/ask spreads during a specified percentage of RTH in accordance with the tables below. ~~For the Eris SOFR Quoting Tiers, participants must quote five (5) of the seven (7) products in Tier A and three (3) of the seven (7) products in Tier B. For the Eris LIBOR Quoting Tiers, participants must quote five (5) of the seven (7) products in both Tiers A and B, and For Tiers A and B, participants must quote six (6) of the seven (7) obligations. For Tier C, participants must quote four (4) of the seven (7) products in Tier C obligations.~~

### Eris SOFR Quoting Tiers

Product	Width (USD)	Width (ticks)	Time-in-Market	Time Period	Tier A	Tier B
					Minimum # of Contracts	Minimum # of Contracts
YIA	\$7.50	3	65%	RTH	1,000	300
YIT	\$15	6			450	150
YIC	\$30	6			300	100
YID	\$50	5			150	75
YIW	\$60	6			150	60
YIB	\$140	7			45	45
YIY	\$180	9			30	30

### Eris LIBOR Quoting Tiers

Product	Width (USD)	Width (ticks)	Time-in-Market	Time Period	Tier A	Tier B	Tier C
					Minimum # of Contracts	Minimum # of Contracts	Minimum # of Contracts
LIT	\$12	6	65%	RTH	1,500	500	300
LIC	\$16	8			750	250	125
LID	\$25	5			750	250	125
LIW	\$30	6			350	125	30
LIB	\$40	4			225	150	75
LIY	\$50	6	60%	65%	150	50	25
	\$60	6			50	25	15
LIE	\$120	12	65%		50	10	25
	\$240				5	5	5

In order to be eligible to receive the incentives for Tier SOFR, participants must be CBOT members and quote two-sided markets in the Products on Globex at designated bid/ask spreads during a specified percentage of RTH in accordance with the table below. Participants must quote three (3) of the seven (7) obligations.

Product	Minimum # of Contracts	Tick Size (\$)	Maximum Width (Ticks)	Maximum Width (\$)	Maximum Width (bp)	Time-in-Market	Time Period
YIA	300	\$2.50	4	\$10.00	1.0	65%	RTH
YIT	150	\$2.50	7	\$17.50	0.9		
YIC	100	\$5.00	6	\$30.00	1.0		
YID	75	\$10.00	5	\$50.00	1.2		
YIW	60	\$10.00	6	\$60.00	1.2		
YIB	45	\$20.00	6	\$120.00	1.7		
YIY	30	\$20.00	9	\$180.00	1.8		

Holiday Quoting Schedule: There will be no quoting obligations on the dates listed below. The Holiday Quoting Schedule may be adjusted by the Exchange. Participants will be given notice of any adjustments to the Holiday Quoting Schedule.

Date	Holiday
10/12/2020	Columbus Day
11/11/2020	Veteran's Day
11/26/2020	Thanksgiving
11/27/2020	Day After Thanksgiving

12/24/2020	Christmas Eve
12/25/2020	Christmas
1/1/2021	New Year's Day
1/18/2021	Birthday of Martin Luther King, Jr.
2/15/2021	Presidents' Day
4/2/2021	Good Friday
5/31/2021	Memorial Day
7/5/2021	Independence Day (Observed)
9/6/2021	Labor Day

## **Incentives**

**Tier A & B LIBOR Fee Waivers (CBOT Members):** Upon meeting the Tier A or Tier B Eris LIBOR Quoting Obligations, as determined by the Exchange, participants that are CBOT members will receive transaction fee waivers for all LIBOR and SOFR-based USD-MAC Eris Swap Futures traded on Globex.

**Tier A & B SOFR Fee Waivers (CBOT Members):** Upon meeting the Tier A or Tier B Eris SOFR Quoting Obligations, as determined by the Exchange, participants that are CBOT members will receive transaction fee waivers for all SOFR-based USD-MAC Eris Swap Futures traded on Globex.

**LIBOR Fee Credits:** Participants meeting the Eris LIBOR Tier A Quoting Obligations and trading over 4,000 500 ADV each month, as determined by the Exchange, will be eligible to receive fee credits. Eligible participants will receive \$0.10 per side on all Globex ADV in the Products above 4,000 500. The fee credits will be capped at ~~\$20,000~~ \$10,000 per participant, per month.

**SOFR Fee Credits:** Participants meeting the Eris SOFR Tier A Quoting Obligations and trading over 500 ADV each month, as determined by the Exchange, will be eligible to receive fee credits. Eligible participants will receive \$0.10 per side on all Globex ADV in the Products above 500. The fee credits will be capped at \$10,000 per participant, per month.

**Progressive Fee Discounts:** Upon meeting the Eris LIBOR Tier C Quoting Obligations, as determined by the Exchange, participants that are CBOT members will receive the Quoting Discounts set forth below. CBOT members or non-members that do not meet the respective Eris SOFR or Eris LIBOR Tier C Quoting Obligations will receive the respective Non-Quoting Discounts set forth below. Non-member participants will only be eligible to receive the Non-Quoting Discounts set forth below.

Progressive ADV Tier (Sides)	Non-Quoting Discounts (Per Side) – LIBOR-based USD MAC <u>Eris Swap Futures</u>	Non-Quoting Discounts (Per Side) – SOFR-based USD-MAC <u>Eris Swap Futures</u>	Quoting Discounts (Per Side)
0 – 50	N/A	N/A	N/A
51 – 250	\$0.12	\$0.20	\$0.20
251 – 500	\$0.14	<del>\$0.25</del> <u>\$0.24</u>	\$0.25
501 – 750	\$0.16	<del>\$0.25</del> <u>\$0.24</u>	\$0.30
751 – 1,000	\$0.18	<del>\$0.25</del> <u>\$0.24</u>	\$0.35
1,001+	\$0.20	<del>\$0.25</del> <u>\$0.24</u>	\$0.45

## **Monitoring and Termination of Status**

The Exchange shall monitor trading activity and participants' performance and shall retain the right to revoke participant status if it concludes from review that a participant no longer meets the requirements of the Program.

If the Exchange determines that a participant has not met its quoting obligations during one (1) calendar month over the course of the Program, but is within twenty percent (20%) of the time-in-market obligations, the participant will be eligible to receive the incentives for that applicable month.

If the Exchange determines that a participant has not met its quoting obligations during one (1) additional calendar month, the participant will be eligible to receive the incentives for that applicable month. Participants must meet quoting obligations for all subsequent months in order to continue to receive the incentives.

Upon utilizing the exceptions set forth above, participants that fail to meet quoting obligations in any additional month may be removed from the Program.