

SUBMISSION COVER SHEET

IMPORTANT: Check box if Confidential Treatment is requested

Registered Entity Identifier Code (optional): 20-160 (2 of 2)

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): 03/18/20

Filing Description: Amendments to CME and CBOT Rule 536.E. ("Negotiated Trades").

SPECIFY FILING TYPE

Please note only ONE choice allowed per Submission.

Organization Rules and Rule Amendments

- Certification § 40.6(a)
- Approval § 40.5(a)
- Notification § 40.6(d)
- Advance Notice of SIDCO Rule Change § 40.10(a)
- SIDCO Emergency Rule Change § 40.10(h)

Rule Numbers: 536.E.

New Product

Please note only ONE product per Submission.

- Certification § 40.2(a)
- Certification Security Futures § 41.23(a)
- Certification Swap Class § 40.2(d)
- Approval § 40.3(a)
- Approval Security Futures § 41.23(b)
- Novel Derivative Product Notification § 40.12(a)
- Swap Submission § 39.5

Official Product Name:

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

- Certification § 40.6(a)
- Certification Made Available to Trade Determination § 40.6(a)
- Certification Security Futures § 41.24(a)
- Delisting (No Open Interest) § 40.6(a)
- Approval § 40.5(a)
- Approval Made Available to Trade Determination § 40.5(a)
- Approval Security Futures § 41.24(c)
- Approval Amendments to enumerated agricultural products § 40.4(a), § 40.5(a)
- "Non-Material Agricultural Rule Change" § 40.4(b)(5)
- Notification § 40.6(d)

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

Rule Numbers:

March 18, 2020

VIA ELECTRONIC PORTAL

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

**Re: CFTC Regulation 40.6(a) Certification. Amendments to CME and CBOT Rule 536.E.
("Negotiated Trades").
CBOT Submission No. 20-160 (2 of 2)**

Dear Mr. Kirkpatrick:

Pursuant to Commodity Futures Trading Commission ("CFTC" or "Commission") Regulation 40.6(a), Chicago Mercantile Exchange Inc. ("CME") and The Board of Trade of the City of Chicago, Inc. ("CBOT") hereby notify the Commission that they are self-certifying amendments to CME and CBOT Rule 536.E. ("Negotiated Trades") to harmonize the rule text with the text of New York Mercantile Exchange, Inc. ("NYMEX") and Commodity Exchange, Inc. ("COMEX") (collectively, the "Exchanges") Rule 536.E. ("Negotiated Trades") effective on Thursday, April 2, 2020 for trade date Friday, April 3, 2020.

In January 2017, amendments to the NYMEX/COMEX Rulebook were adopted in connection with the elimination of open outcry trading of options products, and the text of NYMEX/COMEX Rule 536.E. was modified to specifically enumerate the requirements for brokers receiving block and EFRP orders from customers. Given that there are no differences among the recordkeeping requirements attendant to block and EFRP orders across the Exchanges, and in order to avoid any confusion in that regard, CME and CBOT Rule 536.E. is being harmonized with the language currently contained in NYMEX/COMEX Rule 536.E.

The amendments to CME and CBOT Rule 536.E. are set forth in Exhibit A with additions underscoring and deletions ~~overstruck~~.

CME and CBOT reviewed the designated contract market core principles ("DCM Core Principles") as set forth in the Commodity Exchange Act ("CEA" or "Act") and identified that the amendments to Rule 536.E. may have some bearing on the following Core Principle:

Availability of General Information: The amendments to CME and CBOT Rule 536.E. will be posted on the CME Group website in satisfaction of this core principle. In addition, CME and CBOT will issue a Special Executive Report ("SER") to the marketplace in advance of the amendments to Rule 536.E. becoming effective, which will also be posted on the CME Group website.

Pursuant to Section 5c(c) of the Act and CFTC Regulation 40.6(a), CME and CBOT certify that the amendments to Rule 536.E. comply with the Act and regulations thereunder. There were no substantive opposing views to this proposal.

CME and CBOT certify that this submission has been concurrently posted on the CME and CBOT website at <http://www.cmegroup.com/market-regulation/rule-filings.html>.

If you require any additional information regarding this submission, please contact the undersigned at 212.299.2200 or via email at CMEGSubmissionInquiry@cmegroup.com.

Sincerely,

/s/ Christopher Bowen
Managing Director and Chief Regulatory Counsel

Attachment: Exhibit A: CME and CBOT Rule 536.E. (blackline format)

EXHIBIT A

**CME and CBOT Rulebooks
Chapter 5
("Trading Qualifications and Practices")**
(additions are underscored, deletions are ~~overstruck~~)

536. RECORDKEEPING REQUIREMENTS FOR PIT, GLOBEX, AND NEGOTIATED TRADES

536.E. Negotiated Trades

~~All orders executed in accordance with Rules 526 and 538, unless otherwise exempted by rule, are subject to the recordation requirements pursuant to Section A.1.~~

At the time of execution, every order received from a customer for execution pursuant to Rule 526 ("Block Trades") and Rule 538 ("Exchange for Related Positions") must be in the form of a written or electronic record and include an electronic timestamp reflecting the date and time such order was received, and must identify the specific account(s) for which the order was placed. Such record shall also include an electronic timestamp reflecting the date and time such order was modified, returned, confirmed or cancelled.

[The remainder of the Rule is unchanged.]