

**SUBMISSION COVER SHEET**

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

Registered Entity Identifier Code (optional): 19-137

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 13, 2019 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 13, 2019

**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. 19-137**

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, 2019.

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. 19-137 in any related correspondence.

Sincerely,

/s/ Christopher Bowen  
Managing Director and Chief Regulatory Counsel

Attachment: Exhibit 1

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# 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”), and 30-Year Eris Swap Futures (“LIE”) (collectively, the “Products”).

### Eligible Participants

There is no limit to the number of participants that may participate in the Program. Participants must be CBOT members. Participants may not be participating in any other Eris Swap Futures program. Participants must have 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 have historical activity demonstrating the ability to meet quoting obligations in similar products and through Exchange interest rates programs.

### Program Term

Start date is December 1, 2018. End date is January 31, 2020.

### Hours

Regular Trading Hours (“RTH”), 7:00AM – 4:00PM Chicago Time.

### Obligations

*Minimum Quoting Obligations:* In order to be eligible to receive the Tier A or Tier B Incentives, participants must quote two-sided markets in the Products on Globex at designated monthly bid-ask spreads during a specified percentage of RTH in accordance with the table below. Participants must quote using Day Limit orders.

Product	Width (USD)	Time-in-Market	Time Period	Tier A	Tier B
				Minimum # of Contracts	Minimum # of Contracts
LIT	\$12	65%	RTH	2,000	500
LIC	\$16			1,000	500
LID	\$25			1,000	500
LIW	\$30			1,000	500
LIB	\$40			500	250
LIY	\$50			500	250

LIE	\$110 \$120			100	50
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Tier A RFQ Response Quoting Obligations (Beginning March 1, 2019): In order to be eligible to receive the Tier A Incentives, participants must respond to Globex electronic requests-for-quotes (“RFQs”) beginning ~~March~~ April 1, 2019. Participants must respond to at least 50% of RFQs for the Products with original tenors of 10-Years or less. A response is defined as a 2-sided quote ~~of at least 250 contracts, no more than \$50 wide,~~ at the width and size requirements defined below and provided within 60 seconds of the RFQ. This requirement will apply from 6:30AM to 3:30PM CT, measured monthly.

Product	Width (USD)	Minimum # of Contracts
LIT, LIC	\$12	250
LID, LIW	\$25	100
LIB, LIY	\$50	50

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
12/24/2018	Christmas Eve
12/25/2018	Christmas
1/1/2019	New Year's Day
1/21/2019	Martin Luther King Day
2/18/2019	President's Day
4/19/2019	Good Friday
5/27/2019	Memorial Day
7/4/2019	Independence Day
9/2/2019	Labor Day
10/14/2019	Columbus Day
11/11/2019	Veteran's Day
11/28/2019	Thanksgiving
11/29/2019	Thanksgiving
12/24/2019	Christmas Eve
12/25/2019	Christmas
1/1/2020	New Year's Day
1/20/2020	Martin Luther King Day

## Incentives

Tier A Incentives: Upon meeting the Tier A Obligations, as determined by the Exchange, participants will receive: (i) transaction fee discounts of \$0.45, (ii) maintenance fee discounts of \$1.00, and (iii) fee credits of \$0.10 per side on all ADV on Globex above 1,000. The fee credits will be capped at \$10,000 per participant per month.

Tier B Incentives: Upon meeting the Tier B Obligations, as determined by the Exchange, participants will receive: (i) transaction fee discounts of \$0.45, and (ii) maintenance fee discounts of \$1.00.

### **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 two (2) calendar months 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 each 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 all 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.