

**SUBMISSION COVER SHEET**

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

Registered Entity Identifier Code (optional): 15-209 (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): 06/05/15 Filing Description: Issuance of CME & CBOT Market Regulation Advisory Notice RA1504-3 Regarding All-or-None Transactions

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: 523

**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:

June 5, 2015

**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. Issuance of CME & CBOT Market Regulation Advisory Notice RA1504-3 Regarding All-or-None Transactions. CBOT Submission No. 15-209 (2 of 2)**

Dear Mr. Kirkpatrick:

Chicago Mercantile Exchange Inc. ("CME") and The Board of Trade of the City of Chicago, Inc. ("CBOT") (collectively, the "Exchanges") hereby notify the Commodity Futures Trading Commission ("CFTC" or "Commission") that they are self-certifying the issuance of CME & CBOT Market Regulation Advisory Notice RA1504-3 ("RA1504-3") which provides updated guidance on All-or-None Transactions ("AON") executed pursuant to CME and CBOT Rule 523 ("All-or-None Transactions"). Pursuant to CFTC Regulation 40.6(a), this Submission shall become self-certified on June 22, 2015. However, please note that the revised Advisory Notice will not become effective until Monday, July 6, 2015.

As previously announced, CME Group intends to close most open outcry futures trading by July 2015. As a result, RA1504-3 is being issued to eliminate reference to various interest rate and FX futures contracts as being eligible for execution as AON transactions. Through July 2, 2015, CME and CBOT will continue to permit AON transactions in those interest rate and FX futures contracts currently eligible for AONs pursuant to the guidance contained in CME & CBOT Market Regulation Advisory Notice RA1308-3 from June 24, 2013. Beginning on July 6, 2015, AON eligibility will be eliminated in all CME and CBOT interest rate and FX contracts as such contracts will no longer be eligible for open outcry trading. Rule 523 is applicable exclusively to pit-traded products. There have been no changes to the regulatory guidance contained in the advisory notice. RA1504-3 will be issued on June 8, 2015. A copy of RA1504-3 appears in Exhibit A.

The Exchanges reviewed the designated contract market core principles ("Core Principles") as set forth in the Commodity Exchange Act ("CEA" or "Act") and identified that the issuance of RA1504-3 may have some bearing on the following Core Principles:

Compliance with Rules: The Market Regulation Advisory Notice being issued provides guidance to the marketplace on the regulatory requirements attendant to AON transactions. This guidance is intended to assist market participants in remaining in compliance with Rule 523 and is therefore in compliance with this Core Principle.

Availability of General Information: As required by this Core Principle, the Exchanges are publicly issuing RA1504-3 to ensure that market participants have updated guidance and information attendant to AON transactions. The Advisory Notice will also be available on the CME Group website.

The Exchanges certify that RA1504-3 complies with the Act and regulations thereunder. There were no substantive opposing views to this proposal.

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

If you have any questions regarding this submission, please contact me at 212-299-2200, or via e-mail at [CMEGSubmissionInquiry@cmegroup.com](mailto:CMEGSubmissionInquiry@cmegroup.com).

Sincerely,

/s/ Christopher Bowen  
Managing Director and Chief Regulatory Counsel

Attachment: Exhibit A – Market Regulation Advisory Notice RA1504-3

## Exhibit A

### MARKET REGULATION ADVISORY NOTICE

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<b>Exchange</b>	<b>CME &amp; CBOT</b>
<b>Subject</b>	<b>All-or-None Transactions</b>
<b>Rule References</b>	<b>Rule 523</b>
<b>Advisory Date</b>	<b>June 8, 2015</b>
<b>Advisory Number</b>	<b>CME &amp; CBOT RA1504-3</b>
<b>Effective Date</b>	<b>July 6, 2015</b>

This Advisory Notice supersedes CME & CBOT Market Regulation Advisory Notice RA1308-3 from June 24, 2013. It is being issued to notify the marketplace that beginning on July 6, 2015, in connection with the July 2, 2015, closing of all open outcry futures trading (excluding S&P 500), All-or-None transactions will be permissible only in those products set forth in the list of All-or-None-eligible products that begins on page 4 of this Advisory Notice.

**Market participants are reminded of the following:**

- 1) AON trades may not, under any circumstances, be prearranged or otherwise involve prohibited pre-execution communications.**

Pursuant to Rule 539 ("Prearranged, Pre-negotiated and Noncompetitive Trades Prohibited"), the prearrangement of AON trades and pre-execution communications with respect to AON trades are strictly prohibited. As such, the only information that may be disclosed by any party with respect to an AON order is information that has been publicly exposed in the trading pit. Parties may not solicit potential counterparties to an AON order until the order has been openly bid or offered in the pit.

- 2) AON orders must be competitively and transparently executed in the open market by open outcry.**

All AON trades must be executed openly and competitively, without prearrangement. Bidding and offering practices must at all times be conducive to the competitive execution of trades, and members must ensure that the request for an AON market or the bid or offer for an AON order is clearly and transparently announced to the pit. Additionally, all AON bids and offers must include both quantity and price.

Additionally, in circumstances where a broker has both buy and sell AON orders for accounts with different beneficial ownership, the broker may only cross the orders pursuant to the cross procedures set forth in Rule 533 ("Simultaneous Buy and Sell Orders for Different Beneficial Owners"). Rule 533 requires the broker in these circumstances to bid and offer by open outcry the price and quantity of the AON orders three times. If neither the bid nor offer is accepted, the orders may be matched in the presence, and with the approval, of a designated Exchange official. It is incumbent upon a member handling simultaneous AON buy and sell orders to ensure that his bids and offers for the orders are announced clearly to the pit, and, if executed opposite each other, that the approval of the Exchange official is obtained contemporaneous with the execution of the orders.

**Failure to comply with the aforementioned requirements will result in disciplinary action.**

Market participants are strongly encouraged to review the list of eligible products and quantity thresholds, as well as the FAQ, to ensure an accurate understanding of the requirements for executing AON orders. The text of Rule 523 appears below, followed by the FAQ.

### **Rule 523 – (“ALL-OR-NONE TRANSACTIONS”)**

The Exchange shall determine the minimum thresholds for and the commodities in which All-or-None transactions shall be permitted. The following shall govern All-or-None trading:

1. A member may request an All-or-None bid and/or offer for a specified quantity at or in excess of the applicable minimum threshold. Such request shall be made in the pit designated for the trading of the particular transaction.
2. A member may respond by quoting an All-or-None bid or offer price. A bid or offer in response to an All-or-None request shall be made only when it is the best bid or offer in response to such request, but such price need not be in line with the bids and offers currently being quoted in the regular market.
3. A member shall not execute any order by means of an All-or-None transaction unless the order includes specific instructions to execute an All-or-None transaction or the All-or-None bid or offer is the best price available to satisfy the terms of the order.
4. An All-or-None bid or offer may be accepted by one or more members provided that the entire quantity of the All-or-None order is executed at a single price and that each counterparty to the order accepts a quantity at or in excess of the designated minimum counterparty threshold. Each order executed opposite an All-or-None order must be for a quantity that meets or exceeds the minimum counterparty threshold. Separate orders may not be bunched to meet the minimum counterparty threshold.
5. All-or-None transactions shall not set off conditional orders (e.g., Stop Orders and MIT Orders) or otherwise affect orders in the regular market.
6. All-or-None transactions must be reported to a designated Exchange official who shall record and publish the quantity and prices separately from reports of transactions in the regular market. The brokers executing All-or-None transactions must maintain a record of said transaction in accordance with Rule 536.

### **FAQ Related to CME and CBOT Rule 523 All-or-None Transactions**

**Q1: What is an All-or-None (“AON”) Order?**

A1: An AON order is an order that meets or exceeds an exchange-specified minimum quantity that can be executed only for its entire quantity and only at a single price. AON orders are permitted in certain products and are exclusively executed in the open outcry market during regular trading hours.

**Q2: What are the significant differences between AON transactions and other trades executed via open outcry?**

- A2:
1. AON bids, offers and requests for a market must be for a quantity equal to or in excess of the specified minimum threshold level in an AON-eligible product as set forth in the tables beginning on page 4.
  2. Partial fills for an AON order are not permitted.
  3. The execution price of an AON order may be outside of the best bid/offer in the regular market.
  4. The price at which an AON order is executed does not elect conditional orders (e.g., stop orders, limit orders, MIT orders, etc.) in the regular market or otherwise affect such orders.

5. AON transactions are reported separately from transactions in the regular market in the Time and Sales record.

**Q3: May an AON order be executed opposite more than one counterparty?**

A3: Yes. An AON order may be executed opposite multiple counterparties provided that the order is filled in its entirety at a single price and each opposing party to the order meets the designated minimum counterparty threshold. The minimum counterparty thresholds are listed in the tables beginning on page 4.

**Q4: May a broker bunch separate orders to meet the counterparty minimum?**

A4: No. *Each* order executed opposite an AON order must be for a quantity that meets or exceeds the minimum counterparty threshold.

**Q5: What is the proper procedure for initiating an AON transaction in the pit?**

A5: The initiator of the AON order may request an AON market for a specific quantity or make an AON bid/offer for a specific quantity and price. **Any requests for an AON market and all AON bids and offers must be made openly and clearly announced in the pit.**

A member may respond by quoting an AON bid and/or offer price and the quantity, at or above the designated counterparty minimum, that he is willing to trade. Brokers who have orders that independently meet the minimum counterparty quantity threshold may also bid/offer in response to a request for an AON market.

The individual representing the AON order must determine if the total quantity bid/offered is sufficient to satisfy the entire quantity of the AON order at a single price. If so, he will consummate the AON trade with the opposing market participants. Just as in the regular market, it is the broker's responsibility to allocate quantities if there is more than one opposing party.

**Q6: May two AON orders be crossed?**

A6: AON orders to buy and sell that are for different beneficial owners and are initiated **without prearrangement** may be competitively executed opposite each other in the open market. A single broker may directly cross two AON orders provided that the cross trade procedures set forth in Rule 533 ("Simultaneous Buy and Sell Orders for Different Beneficial Owners") are followed.

Additionally, a broker executing an AON order may not take the opposite side of the order, or any portion of the order, into his own account (or an account in which he has a direct or indirect financial interest or an account over which he has discretionary trading authority) unless the customer has provided prior written consent to waive the application of Rule 531.A. ("General Prohibition") and the broker complies with the cross trade procedures set forth in Rule 533.

**Q7: May intra-commodity spreads or combinations be executed pursuant to Rule 523?**

A7: Yes, provided that the order meets the minimum quantity requirements set forth in the tables on the next page. For products in the tables which do not specify minimum spread quantity requirements, AON intra-commodity spreads may be executed provided that **each** leg of the spread meets the AON threshold for that contract.

### AON-Eligible Products and Minimum Quantity Thresholds - CME

Product	AON Minimum	Counterparty Minimum
Eurodollar options and Eurodollar MidCurve options*	4,000 contracts – (per leg for spreads and combinations)	10% of order
All foreign currency options <u>excluding</u> cross rates, Israeli shekel, Chinese renminbi, Korean won, Czech koruna, Hungarian forint and Polish zloty options	20 contracts	10% of order
Czech koruna, Hungarian forint and Polish zloty options and all foreign currency cross rate options <u>excluding</u> Chinese renminbi/Euro FX options*	5 contracts; (5 contracts per leg in calendar spreads)	5 contracts; (5 contracts per leg in calendar spreads)

\* AON spreads involving Eurodollar, foreign currency and foreign currency cross rate options vs futures may be executed provided that at least one option leg of the spread order meets the designated AON minimum order quantity for the option and the quantity of the futures leg is the appropriate delta equivalent.

### AON-Eligible Products and Minimum Quantity Thresholds - CBOT

Product	AON Minimum	Counterparty Minimum
Treasury and 30-Day Fed Fund options (including flexible Treasury options)*	2,500 contracts (at least one leg of spreads and combinations must be $\geq$ 2,500)	10% of order

\* AON spreads involving Treasury and 30-Day Fed Fund options vs futures may be executed provided that at least one option leg of the spread order meets the designated AON minimum order quantity for the option and the quantity of the futures leg is the appropriate delta equivalent.

Questions regarding this advisory may be directed to one of the following individuals in the Market Regulation Department:

Erin Coffey, Senior Rules & Regulatory Outreach Specialist, at 312.341.3286

Jon Farrimond, Lead Rules & Regulatory Outreach Specialist, at +44 20 3379 3966

Shawn Tan, Senior Rules & Regulatory Outreach Specialist, at +65 65935580

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or [news@cmegroup.com](mailto:news@cmegroup.com).