



June 18, 2018

BY ELECTRONIC SUBMISSION

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

Re: Buy-Side Volume Partnership Program (Eris Exchange, LLC Submission #2018-02)

Dear Mr. Kirkpatrick:

Eris Exchange, LLC (“Eris Exchange” or the “Exchange”) hereby submits for self-certification to the Commodity Futures Trading Commission (the “Commission”), under Commission regulation 40.6(a), its new Volume Partnership Program (“Program”) effective as of June 30, 2018.

Explanation and Analysis

Exhibit A sets forth the terms of the Program.

Description of Rule Changes

Exchange Rule 517 permits the Exchange to establish fee incentive programs. No rule changes are required at this time.

Core Principle Compliance

The Exchange’s staff has identified that the following designated contract market core principles (“Core Principles”) may be potentially impacted: Prevention of Market Disruption, Execution of Transactions, Protection of Market Participants, and Compliance with Rules, and Recordkeeping.

The Program’s incentive structure does not incentivize manipulative trading or market abuse and does not impact the Exchanges’ ability to perform its trade practice and market surveillance obligations under the Act. The Program’s incentives also do not impact order execution. The Exchanges’ market regulation staff will monitor trading under the Program to identify and prevent manipulative trading and market abuse.

Participants in the Program will be selected by the Exchanges’ staff using criteria as further stated in Exhibit A. The Program is subject to trading rules found in the Exchange’s Rulebook, at Chapter 4, that prohibit fraudulent, non-competitive, unfair or abusive practices. Certain trades or trading activity that do not comply with the Exchange’s Rulebook will be disqualified in the Chief Regulatory Officer’s sole discretion.

Furthermore, the Program will be subject to the Exchanges’ record retention policies which comply with the Commodity Exchange Act.



Public Information

A notice and copy of this submission is posted on the Eris Exchange website at <http://www.erisfutures.com/cftc-submissions>.

Opposing Views

This submission was provided to the Regulatory Oversight Committee and there were no opposing views to this Program.

Certification

Eris Exchange, LLC hereby certifies to the Commodity Futures Trading Commission, pursuant to the procedures set forth in Commission regulation §40.6, that this submission complies with the Commodity Exchange Act, as amended, and the regulations promulgated thereunder.

If you have any questions please feel free to contact me at the information below or Laurian Cristea, General Counsel, at laurian.cristea@erisfutures.com or 646-961-4487.

Sincerely yours,

A handwritten signature in black ink, appearing to read "D K", with a stylized flourish at the end.

David Karrow
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Senior Counsel
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EXHIBIT A

Buy-Side Volume Partnership Program

Program Purpose

The purpose of this Program is to incentivize institutional traders who provide sustained volume and liquidity on Eris Exchange. Increased liquidity in contracts traded on Eris Exchange benefits all participants in the market.

Product Scope

All Eris Standard Swap Futures Contracts available for trading on Eris Exchange ("Contracts").

Eligible Participants

Multiple participants may be accepted into the Program. Buy-side participants are required to have the operational capabilities and readiness to conduct high volume of transactions on Eris Exchange, a documented track-record of trading interest rate products, and demonstrated ability to sustain trading in Eris Contracts of at least 1000 ADV over a minimum six-month period. Participant eligibility shall be determined in the sole discretion of the Exchange.

Program Term

The Program start date will be June 30, 2018. The end date will be December 31, 2019.

Hours

The incentives will apply to all trades in the Contracts regardless of the execution time.

Program Incentives

[Confidential]

Monitoring and Termination of Status

The Exchange will monitor trading activity and eligible participants' performance and shall retain the right to revoke program eligibility and/or disqualify certain trades or trading activity not permitted under the Exchange Rulebook, in the Chief Regulatory Officer's sole discretion.

