

**SUBMISSION COVER SHEET**

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

Registered Entity Identifier Code (optional): 20-299 (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): 07/10/20 Filing Description: Increase of CME Committed Cross ("C-Cross") Better Price Match Percentages and Enhancement to Better Price or Volume Match (BPVM) for all CME and CBOT Interest Rate Option Contracts  
**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: See filing.

**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

**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:

July 10, 2020

**VIA ELECTRONIC PORTAL**

Mr. Christopher J. Kirkpatrick  
Office of the Secretariat  
Commodity Futures Trading Commission  
3 Lafayette Center  
1155 21<sup>st</sup> Street NW  
Washington, DC 20581

**Re: CFTC Regulation 40.6(a) Certification. Notification Regarding the Increase of CME Committed Cross (“C-Cross”) Better Price Match Percentages and Enhancement to Better Price or Volume Match (BPVM) for all CME and CBOT Interest Rate Option Contracts.  
CBOT Submission No. 20-299 (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 certify to the Commodity Futures Trading Commission (“CFTC” or “Commission”) amendments to CME and CBOT Rule 539.C. Crossing Protocols Table (the “Table”) to increase the Better Price Match (“BPM”) allocation for Committed Cross (“C-Cross”) transactions from 35% to 45% for all CME and CBOT Interest Rate option contracts on the CME Globex electronic trading platform (“CME Globex”) as noted below.

**CME and CBOT and Rulebook  
Chapter 5  
 (“Trading Qualifications and Practices”)**

**539.C. Pre-Execution Communications Regarding Globex Trades  
 (“Crossing Protocols Table”)**

Exchange	Product Class	Sub-group Options	Committed (“C”) Cross Options - current	Committed (“C”) Cross Options - amended
CME	Interest Rate	ALL options	35%	45%
CBOT	Interest Rate	Treasuries and Fed Funds	35%	45%

Also effective on trade date Monday, July 27, 2020, the Exchanges will enhance the BPM algorithm to adopt a volume component in addition to the existing best price level component, becoming a Better Price or Volume Match (“BPVM”) (collectively, the “Rule Amendments”). The change to the algorithm adopts a volume-component in addition to the existing best price level component. Upon the effective date, if the price of the Request for Cross (“RFC”) represents a new best price level (both a bid price higher than the current bid and an offer price lower than the current offer), or if the price of the RFC is equal to the best bid or offer and the quantity of the RFC is greater than the quantity at that current best bid or offer at the time of submission of the RFC to CME Globex, and, during the five (5) second period between the entry of the

RFC and the cross occurring, a better price for either the buy or sell order has not been entered into CME Globex, a certain percentage of the quantity on the RFC will cross at the RFC price. The percentage is termed a Better Price or Volume (“BPVM”) allocation.

In circumstances where the price of the RFC is equal to the best bid or offer and the quantity of the RFC is greater than the quantity at that current best bid or offer, the quantity eligible for the BPVM is the difference between the RFC quantity and the quantity at that current best bid or offer.

Pursuant to Submission No. 20-121 also dated today July 10, 2020, the Exchanges notified the Commission of related amendments to Rule 539.C. (“Pre-Execution Communications Regarding Globex Trades”) and issuance of CME Group Market Regulation Advisory Notice RA2005-5 in connection therewith.

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 Rule Amendments may have some bearing on the following Core Principles:

- **Compliance with Rules**

The Table codifies the available crossing protocols for transactions executed pursuant to pre-execution communications under Rule 539. and as such the Rule Amendments are in compliance with this Core Principle.

- **Availability of General Information**

As required by this Core Principle the Exchanges will issue a Special Executive Report (“SER”) and update the Table on CME Group's website.

- **Execution of Transactions**

Following the modification of the BPM percentage, the C-Cross protocol in the Contracts remains a competitive means of execution on CME Globex based on the algorithm applied by the match engine to the handling of a Request for Cross (“RFC”). Upon entry of the RFC, Globex will display an indication that a cross has been committed to the market and will occur in five (5) seconds.

Pursuant to Section 5c(c) of the Act and CFTC Regulation 40.6(a), the Exchanges certify that the Rule Amendments comply with the Act and rules thereunder. There were no substantive opposing views to this proposal.

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

Should you have any questions concerning the above, please contact the undersigned 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: Appendix A: CME/CBOT Interest Rate Option Contracts

**Appendix A  
CME/CBOT Interest Rate Option Contracts**

Contract Title	CME Globex Code	Clearing Code	Rulebook Chapter	DCM
OPTIONS ON 2-YEAR BUNDLE	BU2	BU2	454A	CME
OPTIONS ON 3-YEAR BUNDLE	BU3	BU3	455A	CME
OPTIONS ON 5-YEAR BUNDLE	BU5	BU5	456A	CME
EURODOLLAR OPTIONS Week1	E01	1K	452A	CME
EURODOLLAR OPTIONS Week2	E02	2K	452A	CME
EURODOLLAR OPTIONS Week3	E03	3K	452A	CME
EURODOLLAR OPTIONS Week4	E04	4K	452A	CME
EURODOLLAR OPTIONS Week5	E05	5K	452A	CME
2-YR EURODOLLAR MIDCURVE (WEEKLY) Week1	E21	EE1	452A	CME
2-YR EURODOLLAR MIDCURVE (WEEKLY) Week2	E22	EE2	452A	CME
2-YR EURODOLLAR MIDCURVE (WEEKLY) Week3	E23	EE3	452A	CME
2-YR EURODOLLAR MIDCURVE (WEEKLY) Week4	E24	EE4	452A	CME
2-YR EURODOLLAR MIDCURVE (WEEKLY) Week5	E25	EE5	452A	CME
3-YR EURODOLLAR MIDCURVE Week1	E31	EF1	452A	CME
3-YR EURODOLLAR MIDCURVE Week2	E32	EF2	452A	CME
3-YR EURODOLLAR MIDCURVE Week3	E33	EF3	452A	CME
3-YR EURODOLLAR MIDCURVE Week4	E34	EF4	452A	CME
3-YR EURODOLLAR MIDCURVE Week5	E35	EF5	452A	CME
EURODOLLAR OPTIONS Long dated	GE	ED	452A	CME
EURODOLLAR OPTIONS 1 year midcurve	GE0	E0	452A	CME
EURODOLLAR OPTIONS 2 year midcurve	GE2	E2	452A	CME
EURODOLLAR OPTIONS 3 year midcurve	GE3	E3	452A	CME
EURODOLLAR OPTIONS 4 year midcurve	GE4	E4	452A	CME
5-YR EURODOLLAR MIDCURVE OPTIONS	GE5	E5	452A	CME
EURODOLLAR CALENDAR SPREAD OPTION	SPO	SPO	452D	CME
OPTIONS ON ULTRA 10-YEAR U.S. TNOTE Long dated	OTN	TN	26A	CBOT
LONG TERM US TREASURY BOND OPTIONS Long dated	OUB	UBE	40A	CBOT
30Y U.S TREASURY BOND OPTIONS Long dated	OZB	17	18A	CBOT
5 YR TREASURY NOTE OPTIONS Long dated	OZF	25	20A	CBOT
10YR US TREASURY NOTE OPTIONS Long dated	OZN	21	19A	CBOT
30 DAY FED FUND OPTIONS Long dated	OZQ	41	22A	CBOT
2 YR TREASURY NOTE OPTIONS Long dated	OZT	26	21A	CBOT
WKLY OPT ON ULTREA 10-YEAR T NOTE Week1	TN1	TNW	26A	CBOT
WKLY OPT ON ULTREA 10-YEAR T NOTE Week2	TN2	TNW	26A	CBOT
WKLY OPT ON ULTREA 10-YEAR T NOTE Week3	TN3	TNW	26A	CBOT
WKLY OPT ON ULTREA 10-YEAR T NOTE Week4	TN4	TNW	26A	CBOT

WKLY OPT ON ULTREA 10-YEAR T NOTE Week5	TN5	TNW	26A	CBOT
LONG TERM US TREASURY BOND OPTIONS Week1	UB1	UBE	40A	CBOT
LONG TERM US TREASURY BOND OPTIONS Week2	UB2	UBE	40A	CBOT
LONG TERM US TREASURY BOND OPTIONS Week3	UB3	UBE	40A	CBOT
LONG TERM US TREASURY BOND OPTIONS Week4	UB4	UBE	40A	CBOT
LONG TERM US TREASURY BOND OPTIONS Week5	UB5	UBE	40A	CBOT
WK WEDS 30 YR TREASURY BOND OPTIONS Week1	WB1	WBW	18A	CBOT
WK WEDS 30 YR TREASURY BOND OPTIONS Week2	WB2	WBW	18A	CBOT
WK WEDS 30 YR TREASURY BOND OPTIONS Week3	WB3	WBW	18A	CBOT
WK WEDS 30 YR TREASURY BOND OPTIONS Week4	WB4	WBW	18A	CBOT
WK WEDS 30 YR TREASURY BOND OPTIONS Week5	WB5	WBW	18A	CBOT
WK WEDS 5 YR TREASURY NOTE OPTIONS Week1	WF1	WFW	20A	CBOT
WK WEDS 5 YR TREASURY NOTE OPTIONS Week2	WF2	WFW	20A	CBOT
WK WEDS 5 YR TREASURY NOTE OPTIONS Week3	WF3	WFW	20A	CBOT
WK WEDS 5 YR TREASURY NOTE OPTIONS Week4	WF4	WFW	20A	CBOT
WK WEDS 5 YR TREASURY NOTE OPTIONS Week5	WF5	WFW	20A	CBOT
WK WEDS 2 YR TREASURY NOTE OPTIONS Week1	WT1	WTW	21A	CBOT
WK WEDS 2 YR TREASURY NOTE OPTIONS Week2	WT2	WTW	21A	CBOT
WK WEDS 2 YR TREASURY NOTE OPTIONS Week3	WT3	WTW	21A	CBOT
WK WEDS 2 YR TREASURY NOTE OPTIONS Week4	WT4	WTW	21A	CBOT
WK WEDS 2 YR TREASURY NOTE OPTIONS Week5	WT5	WTW	21A	CBOT
WK WEDS ULTRA TREASURY BOND OPTIONS Week1	WU1	WUW	40A	CBOT
WK WEDS ULTRA TREASURY BOND OPTIONS Week2	WU2	WUW	40A	CBOT
WK WEDS ULTRA TREASURY BOND OPTIONS Week3	WU3	WUW	40A	CBOT
WK WEDS ULTRA TREASURY BOND OPTIONS Week4	WU4	WUW	40A	CBOT
WK WEDS ULTRA TREASURY BOND OPTIONS Week5	WU5	WUW	40A	CBOT
WK WEDS ULTRA 10 YR TREASURY NOTE Week1	WX1	WXW	26A	CBOT
WK WEDS ULTRA 10 YR TREASURY NOTE Week2	WX2	WXW	26A	CBOT
WK WEDS ULTRA 10 YR TREASURY NOTE Week3	WX3	WXW	26A	CBOT
WK WEDS ULTRA 10 YR TREASURY NOTE Week4	WX4	WXW	26A	CBOT
WK WEDS ULTRA 10 YR TREASURY NOTE Week5	WX5	WXW	26A	CBOT
WK WEDS 10 YR TREASURY NOTE OPTIONS Week1	WY1	WYW	19A	CBOT
WK WEDS 10 YR TREASURY NOTE OPTIONS Week2	WY2	WYW	19A	CBOT
WK WEDS 10 YR TREASURY NOTE OPTIONS Week3	WY3	WYW	19A	CBOT
WK WEDS 10 YR TREASURY NOTE OPTIONS Week4	WY4	WYW	19A	CBOT
WK WEDS 10 YR TREASURY NOTE OPTIONS Week5	WY5	WYW	19A	CBOT
30Y U.S TREASURY BOND OPTIONS Week1	ZB1	17	18A	CBOT
30Y U.S TREASURY BOND OPTIONS Week2	ZB2	17	18A	CBOT
30Y U.S TREASURY BOND OPTIONS Week3	ZB3	17	18A	CBOT
30Y U.S TREASURY BOND OPTIONS Week4	ZB4	17	18A	CBOT
30Y U.S TREASURY BOND OPTIONS Week5	ZB5	17	18A	CBOT

5 YR TREASURY NOTE OPTIONS Week1	ZF1	25	20A	CBOT
5 YR TREASURY NOTE OPTIONS Week2	ZF2	25	20A	CBOT
5 YR TREASURY NOTE OPTIONS Week3	ZF3	25	20A	CBOT
5 YR TREASURY NOTE OPTIONS Week4	ZF4	25	20A	CBOT
5 YR TREASURY NOTE OPTIONS Week5	ZF5	25	20A	CBOT
10YR US TREASURY NOTE OPTIONS Week1	ZN1	21	19A	CBOT
10YR US TREASURY NOTE OPTIONS Week2	ZN2	21	19A	CBOT
10YR US TREASURY NOTE OPTIONS Week3	ZN3	21	19A	CBOT
10YR US TREASURY NOTE OPTIONS Week4	ZN4	21	19A	CBOT
10YR US TREASURY NOTE OPTIONS Week5	ZN5	21	19A	CBOT
30 DAY FED FUND OPTIONS 2 year midcurve	ZQ1	FF1	22A	CBOT
30 DAY FED FUND OPTIONS 1 year midcurve	ZQ6	FF6	22A	CBOT
2 YR TREASURY NOTE OPTIONS Week1	ZT1	26	21A	CBOT
2 YR TREASURY NOTE OPTIONS Week2	ZT2	26	21A	CBOT
2 YR TREASURY NOTE OPTIONS Week3	ZT3	26	21A	CBOT
2 YR TREASURY NOTE OPTIONS Week4	ZT4	26	21A	CBOT
2 YR TREASURY NOTE OPTIONS Week5	ZT5	26	21A	CBOT