



August 15, 2017

**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: Liquidity Provider Program (Eris Exchange, LLC Submission #2017-04)**

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), an extension of the liquidity provider program previously self-certified on February 13, 2015 (“Program”). The Program will become effective on September 1, 2017.

**Explanation and Analysis**

Exhibit A sets forth the terms of the Program, which remain unchanged other than the applicable dates for the Program.

**Description of Rule Changes**

Exchange Rule 517 permits the Exchange to establish liquidity provider 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, Compliance with Rules, and Recordkeeping.

The Program’s incentive structure does not incentivize manipulative trading or market abuse and does not impact the Exchange’s ability to perform its trade practice and market surveillance obligations under the Commodity Exchange Act. The Program’s incentives also do not impact order execution. The Exchange’s 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 Exchange’s staff using criteria as further stated in Exhibit A and the Exchange staff will track Program participants’ obligations under the program to ensure continued eligibility for the Program incentives. The Program is subject to trading rules found in the Exchange’s Rulebook, at Chapter 5, which prohibit fraudulent, non-competitive, unfair or abusive practices. Certain trades or trading activities that do not comply with the Exchange’s Rulebook will be disqualified in the Chief Regulatory Officer’s sole discretion. All participants must execute a contractual



agreement with the Exchange (“Agreement”) in which each participant will expressly agree to comply with, and be subject to, the applicable regulations and the Exchange Rules (attached hereto as Exhibit B, under confidential treatment request).

Furthermore, the Program will be subject to the Exchange’s 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 View**

This submission was provided to the Regulatory Oversight Committee, the Exchange Practices Committee, and the Exchange Participant Committee. 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 [laurian.cristea@erisfutures.com](mailto:laurian.cristea@erisfutures.com) or 646.961.4487 or David Karrow at [david.karrow@erisfutures.com](mailto:david.karrow@erisfutures.com) or 312.626.2698

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Laurian Cristea", enclosed within a blue oval scribble.

Laurian Cristea  
Chief Regulatory Officer, and  
Head of Legal and Regulatory Affairs  
[laurian.cristea@erisfutures.com](mailto:laurian.cristea@erisfutures.com)  
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## EXHIBIT A

### Liquidity Provider Program

#### Program Purpose

The purpose of this Program is to incentivize liquidity providers to enhance liquidity on Eris Exchange in the products listed in the Product Scope. Increased liquidity in contracts traded on Eris Exchange benefits all participants in the market.

#### Product Scope

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

#### Eligible Participants

Multiple participants may be accepted into the Program. Participants are required to have the technological and operational capabilities and readiness to conduct transactions and/or stream bids and offers on Eris SwapBook™, the Exchange's electronic trading platform. Exchange staff will use a variety of factors in determining whether or not a prospective liquidity provider is selected to participate in the Program, including, but not limited to, past performance in the Contracts, previous experience trading the Contracts and related interest rate products, and the participant's ability to commit to and maintain streaming quote obligations, request for quote ("RFQ") obligations, and/or trading thresholds. Participant eligibility shall be determined in the sole discretion of the Exchange.

#### Program Term

The Program will be extended commencing on ~~March 1, 2015~~ September 1, 2017. The end date will be ~~August-December 31, 2017~~.

#### Hours

The Program is available during Regular Trading Hours, currently Monday through Friday, except Eris Exchange Holidays, from 7:00 am to 5:00 pm Eastern Time.

#### Obligations

Participants must comply with some or all of the following obligations as set forth in the Agreement: (i) provide streaming two-sided quotes on Eris SwapBook™, (ii) provide RFQ responses to market participants, (iii) meet block trade obligations, and/or (iv) satisfy certain trading thresholds.

#### Program Incentives

As set forth in the Agreement, participants receive reduced fees and additional incentives during the Program Term for satisfying Program Obligations.

#### Monitoring and Termination of Status

The Exchange will monitor trading activity and Liquidity Providers' performance and shall retain the right to (1) revoke Liquidity Provider's Program status if the Exchange concludes that a Liquidity Provider no longer meets the eligibility requirements or fails to meet the Obligations of the Program, as set forth in the Agreement, and/or (2) disqualify certain trades or trading activity not permitted under the Exchange Rulebook, in the Chief Regulatory Officer's sole discretion.



**EXHIBIT B**

**CONFIDENTIAL TREATMENT REQUESTED**