

September 9, 2022

SUBMITTED VIA CFTC PORTAL

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

**Re: KalshiEx LLC Self-certification of Rule Amendment
Pursuant to Commission Regulation 40.6(a).**

Dear Sir or Madam,

Pursuant to Section 5c(c) of the Commodity Exchange Act (the “Act”) and Section 40.6(a) of the regulations of the Commodity Futures Trading Commission (the “Commission”), KalshiEX LLC (“Exchange”) hereby notifies the Commission of its intent to amend the Exchange fee schedule as described in the attached exhibit. The changes will be effective on September 22, 2022.

Kalshi has determined that this amendment complies with the Act, the Commission’s Core Principles for Designated Contract Markets (“DCM”), and is made in accordance with Kalshi Rulebook Rules 3.6(b)¹ and 3.6(e).² The amendment includes a formulaic explanation of the current fee structure, clarifications as to fees not collected by the Exchange, and creates a separate fee structure for certain markets. Specifically, the amendment lowers the current fee for the Exchange’s indices markets by amending the fee formula for these markets from “fees = round up(0.07 x C x P x (1-P))” to “fees = round up(0.035 x C x P x (1-P))”, where “P” is the price of a contract in dollars (50 cents is 0.5) and “C” is the number of contracts being traded, as described therein.

Kalshi has identified the following Core Principles as potentially being affected by this amendment: Core Principle 2 (Compliance with Rules), Core Principle 4 (Prevention of Market

¹ Kalshi Rulebook Rule 3.6(b) states as follows: “Members may be charged fees in connection with the trading of Contracts in such amounts as may be revised from time to time to be reflected on the Company’s Website”

² Kalshi Rulebook Rule 3.6(e) states as follows: “If Kalshi determines in the future to impose dues or additional fees, the Member will be provided notice of the change at the time the amended fees are filed with the Commission. The new fee structure will be implemented no earlier than on the first available trade date for which the change may be implemented according to the Commission’s self-certification filing requirements as set forth in Commission Regulation 40.6(a).”

Disruption), Core Principle 7 (Availability of General Information), Core Principle 9 (Execution of Transactions), and Core Principle 12 (Protection of Markets and Market Participants).

Core Principle 2, implemented by Regulation 38.151, requires a DCM to provide its members with comparable fee structures. The fee schedule amendments will apply uniformly to all Members of the Exchange. Core Principle 4, implemented by Regulation 38.251, obligates the Exchange to monitor trading on the Exchange to prevent manipulative trading and market abuse. The fee schedule amendments do not compromise the Exchange's current surveillance practices. Core Principle 7, implemented by Regulation 38.401, requires a DCM to make available to the public the terms, conditions, rules, regulations, and specifications of the Exchange. The Exchange fee schedule is currently available on the Exchange website, and will continue to be made available after the amendments discussed herein are implemented. Core Principle 9, implemented by Regulation 38.500, requires the Exchange to provide its members with a competitive, open, and efficient market and mechanism for executing transactions. The fee schedule amendments will not impact a member's ability to execute a transaction on the Exchange. Core Principle 12, implemented by Regulation 38.651, requires the Exchange to protect market participants from abusive practices committed by any party. The fee schedule amendments do not compromise the current protections delineated in Chapter 5 of the Exchange Rulebook.

No substantive opposing views were expressed to the Exchange by its governing board or committee members, members of the Exchange, or market participants. A copy of this submission has been concurrently posted on the Exchange website.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Elie Mishory
Chief Regulatory Officer
KalshiEX LLC
emishory@kalshi.com