



Via Portal Submission

September 14, 2016

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

Re: OneChicago, LLC Rule Submission
Removing Schedule A to Chapter 4 from the OneChicago Rulebook
(OCX Submission Number 16-019)

Dear Mr. Kirkpatrick:

Pursuant to section 5c(c)(1) of the Commodity Exchange Act, as amended (the “Act”), and § 40.6(a) of the regulations promulgated by the Commodity Futures Trading Commission (“CFTC” or the “Commission”) under the Act, OneChicago, LLC (“OneChicago,” “OCX,” or the “Exchange”) hereby submits the following rule amendment. OneChicago is amending its Rulebook to remove Schedule A to Chapter 4 (“Schedule A”). Schedule A contains a list of OneChicago Contracts for which the position limit is either 22,500 or position accountability. In other words, it contains the products that are set to a higher limit than the default position limit of 13,500.

OneChicago is making this change because the position limits for each product are displayed in OneChicago’s daily “Position Limits” file, which is available on OneChicago’s public ftp site.¹ Unlike Schedule A, the Position Limits file is machine-readable, and is consumed by OneChicago’s market participants on an automated basis. Rather than amend both Schedule A and the Position Limits file every month as OneChicago rebalances position limits for its products, OneChicago has determined to remove Schedule A from the OneChicago Rulebook. OneChicago will continue to issue a monthly Regulatory Release informing market participants of amendments to position limits. The rule amendment will become effective on September 28, 2016.

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¹ ftp.onechicago.com/position_limits/

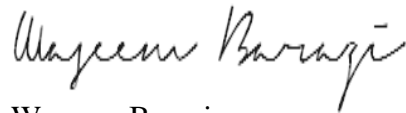
The purpose and effect of the rule amendment is to refer market participants to OneChicago's public ftp site to gather information regarding those OneChicago Contracts with position limits above the default 13,500 contracts. This rule amendment will also reduce clerical work associated with amending OneChicago's position limits each month. Comments on the rule amendment have not been solicited and none have been received. OneChicago is not aware of any substantive opposing views to these rule amendments. OneChicago certifies that the rule amendment complies with the Act, including the core principles, and the Commission's regulations promulgated thereunder. OneChicago further certifies that a copy of this submission has been posted on the [OneChicago website](#).

OneChicago staff has reviewed the core principles applicable to designated contract markets ("DCMs"), and has concluded that the rule amendments may have some bearing upon the following core principle(s):

Core Principle 7: Core Principle 7 requires DCMs to make available to market authorities, market participants, and the public accurate information concerning the rules and regulations for executing transactions on the contract market. This rule amendment supports Core Principle 7 in that it provides a central location for OneChicago market participants to view and consume the position limits for all OneChicago Contracts.

If you have any questions or comments related to this filing, please feel free to contact me by telephone at (312) 883-3441 or through e-mail at wbarazi@onechicago.com.

Respectfully Submitted,



Waseem Barazi
Chief Regulatory Officer and Associate General Counsel

Encl: Attachment A

Attachment A

414. Position Limits and Position Accountability

(a) Position limits shall be as established by the Exchange from time to time as permitted by Commission Regulation § 41.25 and as set forth in ~~Schedule A to Chapter 4~~ on OneChicago's public website. Such position limits shall be aggregated among contracts that overlay the same commodity and expire on the same day. Position limits for weekly contracts are always in effect. Except as specified in paragraph (b) below, no Clearing Member, Exchange Member or Access Person shall control, or trade in, any number of Contracts that exceed any position limits so established by the Exchange. Except as specified in paragraph (b) below, no Clearing Member, Exchange Member or Access Person shall be permitted to enter into any transaction on the Exchange that would cause such Clearing Member, Exchange Member or Access Person to exceed any position limits.

(b) – (f) No Change

(g) *Position Accountability.* The Exchange has adopted this position accountability rule for security futures products where the average daily trading volume in the underlying security exceeds 20 million shares and there are more than 40 million shares of the underlying security outstanding. A Person owning or controlling more than a specified number of futures contracts net long or short in all contracts overlaying the same commodity combined (as set forth in ~~Schedule A to this Chapter 4~~ on OneChicago's public website, as may be amended from time to time) must provide, in a timely fashion, upon request by the Exchange, information regarding the nature of the position, trading strategy, and hedging information if applicable, and consent to halt increasing their positions when so ordered by the Exchange.

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Schedule A to Chapter 4*

Underlying Symbol	Security Name	Position Limit**	Position Accountability***	Unit/Multiplier
AA	Alcoa Inc.		22,500	100
AAPL	Apple Inc.		22,500	100
ABX	Barrick Gold Corp.		22,500	100
AMD	Advanced Micro Devices, Inc.		22,500	100
BAC	Bank Of America Corp		22,500	100
C	Citigroup, Inc.		22,500	100
CHK	Chesapeake Energy Corp		22,500	100
CSCO	Cisco Systems, Inc.		22,500	100
ECA	EnCana Corp.	22,500		100

ETE	Energy Transfer Equity, L.P.	22,500		100
F	Ford Motor Company		22,500	100
FB	Facebook, Inc.		22,500	100
FCX	Freeport McMoRan Inc.		22,500	100
FTR	Frontier Communications Corp.	22,500		100
GE	General Electric Company		22,500	100
INTC	Intel Corporation		22,500	100
ITUB	Itau Unibanco Holding S.A.	22,500		100
JPM	JPMorgan Chase & Co.	22,500		100
KMI	Kinder Morgan, Inc.	22,500		100
MRO	Marathon Oil Corp.		22,500	100
MS	Morgan Stanley	22,500		100
MSFT	Microsoft Corporation		22,500	100
MT	ArcelorMittal	22,500		100
MU	Micron Technology Inc.		22,500	100
PBR	Petróleo Brasileiro S.A		22,500	100
PFE	Pfizer		22,500	100
RF	Regions Financial Corp.		22,500	100
RIG	Transocean Ltd.	22,500		100
S	Sprint Corp	22,500		100
SIRI	Sirius XM Holdings, Inc.		22,500	100
SUNE	SunEdison, Inc.		22,500	100
SWN	Southwestern Energy Co.	22,500		100
T	AT&T Corporation		22,500	100
TWTR	Twitter, Inc.		22,500	100
VALE	Vale S.A.		22,500	100
VRX	Valeant Pharmaceuticals Intl, Inc.		22,500	100
WFC	Wells Fargo & Co.	22,500		100
WFT	Weatherford Intl Ltd	22,500		100
WLL	Whiting Petroleum Corp.		22,500	100
X	United States Steel Corp.	22,500		100
Exchange Traded Funds				
DUST	Direxion Daily Gold Miners Bear 3X ETF	22,500		100
EEM	iShares MSCI Emerging Markets Index		22,500	100
EFA	iShares MSCI EAFE Index Fund		22,500	100
EWJ	iShares MSCI Japan ETF		22,500	100
EWZ	iShares MSCI Brazil Capped ETF		22,500	100
FXI	iShares China Large Cap		22,500	100
GDX	Market Vectors Gold Miners ETF		22,500	100
IWM	iShares Russell 2000 Index Fund		22,500	100
QQQ	PowerShares QQQ		22,500	100

SPY	SPDR S&P 500 ETF Trust		22,500	100
USO	United States Oil ETF		22,500	100
VWO	Vanguard FTSE Emerging Markets ETF	22,500		100
VXX	iPath S&P 500 VIX Short Term Futures ETN	22,500		100
XLE	SPDR Energy Select Sector ETF	22,500		100
XLF	Financial Select Sector SPDR		22,500	100
XLU	SPDR Utilities Select Sector ETF	22,500		100
XOP	SPDR S&P Oil & Gas Exploration & Production ETF	22,500		100
	*Positions are aggregated for all classes for the same underlying security			
	**Generally, the position limits for single stock futures are no greater than 13,500 contracts net long or short during the last five trading days of an expiring contract month. The products listed here qualify for higher position/accountability limits. See, OCX Rule 414.			
	*** Position Accountability Rule 414(g): The Exchange has adopted this position accountability rule for security futures products where the average daily trading volume in the underlying security exceeds 20 million shares and there are more than 40 million shares of the underlying security outstanding. A Person owning or controlling more than a specified number of futures contracts net long or short in all contract months combined, as set forth in this Schedule A, must provide, in a timely fashion, upon request by the Exchange: <ul style="list-style-type: none"> a) Information regarding the nature of the position b) Trading strategy c) Hedging information if applicable, and consent to halt increasing their positions when so ordered by the Exchange 			
	Securities that are not included in the above table are those: <ul style="list-style-type: none"> a) With a multiplier of 100, the position limit = 13,500 b) With a multiplier of 1000, the position limit = 1,350 			