

September 17, 2015

BY ELECTRONIC SUBMISSION

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

Re: Amendments for Form 102A and 102B Submissions for Ownership and Control Reporting (Eris Exchange, LLC Submission #2015-06)

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), the following conforming amendments to the Eris Exchange Rulebook with regard to submission of Form 102A and Form 102B for Ownership and Control Reporting (“OCR”). The proposed changes will become effective on October 1, 2015.

Explanation and Analysis

The Exchange is aligning its Rules with the Commission’s new OCR submission requirements.

The Exchange notes that a no action request has been made to extend CFTC due dates for OCR implementation. In the event that CFTC grants no action relief, the Exchange will grant the same extensions to the above-referenced date.

Description of Rule Changes

Rules 532 and 533 currently require that Clearing Firms submit CFTC Form 102 to the Market Regulation Department for each reportable account as set forth in the Table in Rule 533. Rules 532 and 533 are amended to require the submission of new Commission Forms 102A and 102B for a reportable account.

The Exchange has attached a copy of the amended Rules, including all additions and deletions hereto as Exhibit 1.

Additionally, the Exchange issued Market Notice #15-M10 on August 10, 2015 to inform market participants of this pending change and allow market participants to submit Form 102 in lieu of Form 102A until December 31, 2015. This notice can be found on the Exchange’s website at <http://www.erisfutures.com/market-notices>.

Core Principle Compliance

Eris Exchange has concluded that its compliance with the DCM Core Principles is not adversely affected by this change and it will continue to comply with all DCM Core Principles.

Timely and accurate reportable account owner and control information is necessary for the Market Regulation Department's ability to monitor positions at or above the reportable levels in Eris Exchange products and to comply with Commission regulations regarding position limitations and accountability. The amendments are intended to enhance the Market Regulation Department's ability to perform those duties.

Public Information

A notice and copy of this submission has been concurrently posted on the Exchange's website at <http://erisfutures.com/cftc-submissions>.

Opposing Views

This submission was provided to the Exchange Practices Committee and the Regulatory Oversight Committee, and there were no opposing views expressed that were not incorporated into the rule changes.

Certification

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

In the event that you have questions, please contact me at the information below.

Sincerely,



Laurian Cristea
Chief Regulatory Officer, and
Head of Legal and Regulatory Affairs
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EXHIBIT 1
Redline and Clean Rulebook Changes

RULE 532. Reports of Large Positions and Ownership and Control Reporting

(a) Large Trader Reporting

- (1) Clearing Firms shall submit to the Exchange a daily report of all positions ~~required to be reported at or above the Reportable Futures Level~~ as set forth in the Table in Rule 533-
("Large Trader Report").
- (2) Positions at or above the ~~reportable level~~Reportable Futures Level in a discrete Commodity Code trigger reportable status. For a person in reportable status in a discrete Commodity Code, all positions, regardless of size, in the same discrete Commodity Code must be reported.

For the avoidance of doubt, if the discrete Commodity Code that triggers the reportable status is a Contract with a A9102 Commodity Code, then all other positions in Contracts with a A9102 Commodity Code would be required to be reported under this Rule 532(b). Any other discrete Commodity Codes (i.e., A0004, A0006, other *Annnn* Commodity Codes, *Bnnnn* Commodity Codes, *Cnnnn* Commodity Codes, or *Dnnnn* Commodity Codes) would not be required to be reported (provided that such A0004, A0006, other *Annnn* Commodity Codes, *Bnnnn*, Commodity Codes, *Cnnnn* Commodity Codes, or *Dnnnn* Commodity Codes have not independently triggered reportable status).

- (3) All ~~large trader reports~~Large Trader Reports shall be submitted in a form acceptable to the Market Regulation Department. The Exchange may require that more than one ~~large trader report~~Large Trader Report be submitted daily. The Regulatory Oversight Committee or the Market Regulation Department may require reports from any Clearing Firm on a lesser number of positions than reflected in the Table in Rule 533.

(b) Ownership and Control Reporting

- (1) Clearing Firms must provide the Market Regulation Department with the required CFTC Form ~~102 ("Identification of Special Accounts")~~102A and/or Form 102B identifying the owner, any controlling parties and any additional required information for each reportable account. ~~-A reportable account for the purposes of this Rule 532(b)(1) is an account at or above the Reportable Futures Level and/or the Volume Threshold Reportable Level as identified in the Table in Rule 533.~~
- ~~(4)~~(2) The ~~form~~applicable Form 102A and/or Form 102B must be submitted to the Market Regulation Department no later than ~~the business day~~9:00 am Eastern Time on the Business Day following the date on which the account becomes reportable. Additionally, Clearing Firms must submit a revised form reflecting any material changes

to the information previously provided to the Market Regulation Department within three ~~business days~~Business Days of such changes becoming effective. In the absence of any material changes, the Exchange may require electronic submission of a new Form 102A and/or Form 102B on an annual basis for the maintenance of accurate records.

RULE 533. Position Limit, Position Accountability~~and~~, Reportable Level and Volume Threshold Level Table

(a) The reportable levels for all Contracts are set forth in the ~~Position Limit and Reportable Level~~ Table below. For purposes of the ~~large trader report~~Large Trader Report, Contracts shall be reported according to discrete Commodity Code. The Commodity Code shall be the Contract's Clearing Code, as defined in Rule 1101, absent the Z at the beginning of the code. The Commodity Code is an alpha-numeric code that consists of two components. The first component is the letter at the beginning of the code, which represents the tenor of the contract. The second component of the Commodity Code is the 4 numbers that follow the letter (i.e., "nnnn" in the Table below). These 4 numbers represent each unique contract, meaning a contract with a different coupon and/or a different first trade date, for any given maturity date. For example, a Contract with a Clearing Code of ZA0004 shall have a Commodity Code of A0004 and a Contract with a Clearing Code of ZA0006 shall have a Commodity Code of A0006. For purposes of the large trader report, all Contracts in the respective Commodity Code (i.e., A0004 or A0006) shall be grouped in order to determine reportable futures level and position accountability. The reportable level is the net long position or the net short position for each discrete Commodity Code. Pursuant to Rule 909, concurrent long and short positions must be reported to the Exchange for both sides as open positions (i.e., net long positions or net short positions).

~~(b) A Volume Threshold Reportable Account (as identified in the Table below) is any account that meets the volume threshold of contracts traded in a single trading day as defined in CFTC Regulation 15.04. A Clearing Firm shall submit an applicable CFTC Form 102B in accordance with Rule 532(d) for each account that becomes a Volume Threshold Reportable Account.~~

~~(b)~~

~~Position Limit and , Position Accountability, Reportable Level and Volume Threshold Level Table:~~

	Commodity Code	Tenor of each discrete Commodity Code	Rule	Reportable Futures Level for each discrete Commodity Code (Large Trader Report Form and Form 102A)	Position Accountability for each discrete Commodity Code	Position Limit for each discrete Commodity Code	Volume Threshold Reportable Level for each discrete Commodity Code (Form 102B)
Interest Rate Swap Futures Contract	<i>Annnn</i>	Less than or equal to 2 years	4404	3000	6000	N/A	50
Interest Rate Swap Futures Contract	<i>Bnnnn</i>	Greater than 2 years and less than or equal to 5 years	4404	3000	6000	N/A	50
Interest Rate Swap Futures Contract	<i>Cnnnn</i>	Greater than 5 years and less than or equal to 10 years	4404	3000	6000	N/A	50
Interest Rate Swap Futures Contract	<i>Dnnnn</i>	Greater than 10 years	4404	3000	6000	N/A	50

RULE 532. Reports of Large Positions and Ownership and Control Reporting

(a) Large Trader Reporting

- (1) Clearing Firms shall submit to the Exchange a daily report of all positions at or above the Reportable Futures Level as set forth in the Table in Rule 533 (“Large Trader Report”).
- (2) Positions at or above the Reportable Futures Level in a discrete Commodity Code trigger reportable status. For a person in reportable status in a discrete Commodity Code, all positions, regardless of size, in the same discrete Commodity Code must be reported.

For the avoidance of doubt, if the discrete Commodity Code that triggers the reportable status is a Contract with a A9102 Commodity Code, then all other positions in Contracts with a A9102 Commodity Code would be required to be reported under this Rule 532(b). Any other discrete Commodity Codes (i.e., A0004, A0006, other *Annnn* Commodity Codes, *Bnnnn* Commodity Codes, *Cnnnn* Commodity Codes, or *Dnnnn* Commodity Codes) would not be required to be reported (provided that such A0004, A0006, other *Annnn* Commodity Codes, *Bnnnn*, Commodity Codes, *Cnnnn* Commodity Codes, or *Dnnnn* Commodity Codes have not independently triggered reportable status).

- (3) All Large Trader Reports shall be submitted in a form acceptable to the Market Regulation Department. The Exchange may require that more than one Large Trader Report be submitted daily. The Regulatory Oversight Committee or the Market Regulation Department may require reports from any Clearing Firm on a lesser number of positions than reflected in the Table in Rule 533.

(b) Ownership and Control Reporting

- (1) Clearing Firms must provide the Market Regulation Department with the required CFTC Form 102A and/or Form 102B identifying the owner, any controlling parties and any additional required information for each reportable account. A reportable account for the purposes of this Rule 532(b)(1) is an account at or above the Reportable Futures Level and/or the Volume Threshold Reportable Level as identified in the table in Rule 533.
- (2) The applicable Form 102A and/or Form 102B must be submitted to the Market Regulation Department no later than 9:00 am Eastern Time on the Business Day following the date on which the account becomes reportable. Additionally, Clearing Firms must submit a revised form reflecting any material changes to the information previously provided to the Market Regulation Department within three Business Days of such changes becoming effective. In the absence of any material changes, the Exchange may require electronic submission of a new Form 102A and/or Form 102B on an annual basis for the maintenance of accurate records.

RULE 533. Position Limit, Position Accountability, Reportable Level and Volume Threshold Level Table

- (a) The reportable levels for all Contracts are set forth in the Table below. For purposes of the Large Trader Report, Contracts shall be reported according to discrete Commodity Code. The Commodity Code shall be the Contract's Clearing Code, as defined in Rule 1101, absent the Z at the beginning of the code. The Commodity Code is an alpha-numeric code that consists of two components. The first component is the letter at the beginning of the code, which represents the tenor of the contract. The second component of the Commodity Code is the 4 numbers that follow the letter (i.e., "nnnn" in the Table below). These 4 numbers represent each unique contract, meaning a contract with a different coupon and/or a different first trade date, for any given maturity date. For example, a Contract with a Clearing Code of ZA0004 shall have a Commodity Code of A0004 and a Contract with a Clearing Code of ZA0006 shall have a Commodity Code of A0006. For purposes of the large trader report, all Contracts in the respective Commodity Code (i.e., A0004 or A0006) shall be grouped in order to determine reportable futures level and position accountability. The reportable level is the net long position or the net short position for each discrete Commodity Code. Pursuant to Rule 909, concurrent long and short positions must be reported to the Exchange for both sides as open positions (i.e., net long positions or net short positions).
- (b) A Volume Threshold Reportable Account (as identified in the Table below) is any account that meets the volume threshold of contracts traded in a single trading day as defined in CFTC Regulation 15.04. A Clearing Firm shall submit an applicable CFTC Form 102B in accordance with Rule 532(d) for each account that becomes a Volume Threshold Reportable Account.

Contract Name	Commodity Code	Tenor of each discrete Commodity Code	Reportable Futures Level for each discrete Commodity Code (Large Trader Report and Form 102A)	Position Accountability for each discrete Commodity Code	Position Limit for each discrete Commodity Code	Volume Threshold Reportable Level for each discrete Commodity Code (Form 102B)
Interest Rate Swap Futures Contract	<i>Annnn</i>	Less than or equal to 2 years	3000	6000	N/A	50
Interest Rate Swap Futures Contract	<i>Bnnnn</i>	Greater than 2 years and less than or equal to 5 years	3000	6000	N/A	50
Interest Rate Swap Futures Contract	<i>Cnnnn</i>	Greater than 5 years and less than or equal to 10 years	3000	6000	N/A	50
Interest Rate Swap Futures Contract	<i>Dnnnn</i>	Greater than 10 years	3000	6000	N/A	50