



Via Portal Submission

September 27, 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  
Issuing Regulatory Release 2016-23 (OneChicago Ownership and Control  
Reports)  
(OCX Submission Number 16-022)

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 Regulatory Release (“RR”). OneChicago is amending its Ownership and Control Reports Guide (“OCR Guide”) to inform market participants that, beginning on November 7, 2016, OCR information must be submitted for all accounts that have a reportable position in OneChicago Contracts, even if the Reporting Firm has previously submitted a legacy 102 form PDF for the account. The OCR Guide is enclosed as Attachment A.

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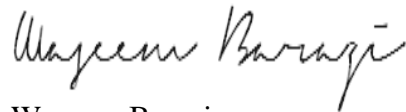
The purpose and effect of the RR is to instruct market participants to report OCR information for all accounts, including those for which the Reporting Firm has previously submitted a legacy 102 form PDF on behalf of. Comments on the RR have not been solicited and none have been received. OneChicago is not aware of any substantive opposing views to the RR. OneChicago certifies that the RR 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 RR 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. The RR supports Core Principle 7 in that it provides market participants with information regarding how to comply with the Rules of the Exchange.

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](mailto:wbarazi@onechicago.com).

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Waseem Barazi". The signature is written in a cursive style with a horizontal line at the end.

Waseem Barazi  
Chief Regulatory Officer and Associate General Counsel

Encl: Attachment A

**Attachment A**

(See Following Page)

Date: September 27, 2016  
Re: OneChicago Ownership and Control Reports  
Effective Date: November 7, 2016

OneChicago, LLC (“OneChicago” or “OCX”) is issuing this Regulatory Release (“RR”) 2016-23 to provide market participants with instructions on how to comply with OCX Rule 516 (Ownership and Control Reports) (adopted April 6, 2015). OCX Rule 516 requires that “Clearing Members report to the Exchange in a form and manner prescribed by the Exchange reportable positions and related information relating to Exchange Contracts that Clearing Members are required to report to the Commission pursuant to Commission regulations.”

This RR supersedes RR 2016-19 to inform Reporting Firms that, beginning on November 7, 2016, OCR information must be submitted for all accounts that have a reportable position in OneChicago Contracts, even if the Reporting Firm has previously submitted a legacy 102 form PDF for the account.

## **OneChicago Ownership and Control Reports**

On November 18, 2013, the Commodity Futures Trading Commission (“CFTC”) published its final OCR rules. OneChicago will begin requiring submission of Form 102 information in the same format as will be required by the CFTC. For technical specifications, please refer to the CFTC Technical Guidance Document, available [here](#). OneChicago will only accept OCR in the CFTC format.

OCR submissions by market participants must be made electronically in one of two ways. For firms participating in FIA Technology Services, Inc.’s (“FIA Tech”) OCR solution, submissions will be sent from FIA Tech to OneChicago on behalf of those firms. For firms not participating in the FIA Tech OCR solution, OneChicago will establish a secure file transfer protocol (“SFTP”) directory to which the non-participating firms must submit Form 102 information in the same format as is required by the CFTC. Each OneChicago Clearing Member must notify OneChicago whether it will participate in the FIA Tech OCR solution or whether it will submit the Form 102 information to OneChicago electronically via SFTP.

## **Required Reporting to OneChicago**

OneChicago will require electronic filing of the following forms:

- **New Form 102A:** This form collects information with respect to position-based special accounts. A special account is any account with a reportable position. The OneChicago exchange level reportable position for Form 102A is one (1) contract in any security

futures product (overlying either an individual equity security or narrow-based security index). Form 102A must be submitted to OneChicago by 9:00 a.m. CT on the business day following the date on which a special account becomes reportable. OneChicago will begin requiring the electronic submission of New Form 102A on November 7, 2016.

- **New Form 102B:** This form requires the transaction-based reporting of trading accounts that have daily trading volume that exceeds a specified level in a single trading day, regardless of whether the accounts maintain positions at the end of the day. The OneChicago exchange level reportable position for Form 102B is fifty (50) contracts in any security futures product (overlying either an individual equity security or narrow-based security index) with the same product identifier, or any such other level as determined by the CFTC. Form 102B must be submitted to OneChicago by 9:00 a.m. CT on the business day following the date on which a volume threshold account becomes reportable. OneChicago will begin requiring the electronic submission of New Form 102B on November 7, 2016.

## Testing

OneChicago began accepting and processing test files for OCR submission on July 6, 2016. The file naming convention for submissions and test submissions should be as indicated in the CFTC Technical Guidance Document.

## Milestone Dates

- May 23, 2016:** Reporting firms began onboarding and connectivity testing to the OneChicago User Acceptance Test (“UAT”) and production environments.
- July 6, 2016:** Reporting firms began user acceptance testing for conformance in the UAT environment.
- October 3, 2016:** OneChicago begins accepting and processing electronic OCR submission in its production environments. Firms successfully submitting electronic OCR to OneChicago’s production environment are not required to submit legacy PDFs in the period between October 3, 2016 and November 7, 2016.
- November 7, 2016:** All reporting firms are required to have migrated to electronic OCR submission.

## Please note the following:

- OneChicago’s reportable levels are lower than the CFTC’s reportable levels and therefore a Form 102A may be required by OneChicago earlier than the CFTC would require.

- OneChicago will require Clearing Members and omnibus accounts to submit Form 102A and all related accounts as well as Form 102B accounts.
- All Clearing Members, including those that trade solely proprietarily for their own accounts, will be required to submit OCR electronically.
- Prior to November 7, 2016, Reporting Firms may continue to submit legacy Form 102's at the reportable level of 200 contracts.
- Beginning on November 7, 2016, Reporting Firms must submit Form 102A or 102B information for all accounts with reportable positions, including accounts that the Reporting Firm may have previously submitted a legacy 102 PDF on behalf of.

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Any questions regarding OCR can be directed to OneChicago Operations through phone at (312) 883-3411 or through e-mail at [operations@onechicago.com](mailto:operations@onechicago.com).