



October 5, 2018

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

Re: Cboe Futures Exchange, LLC Rule Certification
Submission Number CFE-2018-022

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (“Act”), and §40.6(a) of the regulations promulgated by the Commodity Futures Trading Commission (“Commission”) under the Act, Cboe Futures Exchange, LLC (“CFE” or “Exchange”) hereby submits a CFE rule amendment (“Amendment”) to amend CFE Policy and Procedure XV which sets forth the Cboe® iBoxx® iShares® Bond Index Futures Lead Market Maker Program (“LMM Program”).¹ The Amendment is set forth in a segregated confidential Appendix A to this submission. The Amendment will become effective on October 22, 2018.

Any CFE Trading Privilege Holder (“TPH”) organization may apply to the Exchange for appointment as a lead market maker (“LMM”) in the LMM Program. The Exchange may approve up to five LMMs for CB Index futures. TPHs are selected by the Exchange based on the Exchange’s judgment as to which applicants are most qualified to perform the functions of an LMM for CB Index futures based on specified criteria. The LMM Program provides for market performance benchmarks that LMMs must satisfy in order to receive specified benefits. The market performance benchmarks include parameters with respect to minimum two-sided quote size and maximum quote width. The market performance benchmarks are applicable during CB Index futures trading hours. The Amendment clarifies one aspect relating to the benefits that LMMs receive under the LMM Program. The Exchange believes that the market performance benchmarks and associated benefits under the amended LMM Program strike the appropriate balance to incentivize and retain liquidity providers in CB Index futures. Exhibit 1 to this submission includes the description of the LMM Program which is currently included in Policy and Procedure XV of the Policies and Procedures Section of the CFE Rulebook and which is not changing as a result of the Amendment.

¹ The LMM Program applies to futures on iBoxx® iShares® Bond Indexes (“Corporate Bond Indexes” or “CB Indexes”). CFE currently lists for trading futures on one CB Index and plans to list for trading futures on an additional CB Index. Specifically, CFE currently offers trading in Cboe® iBoxx® iShares® \$ High Yield Corporate Bond Index (“IBHY”) futures and CFE plans to offer trading in Cboe® iBoxx® iShares® \$ Investment Grade Corporate Bond Index (“IBIG”) futures. See Exhibit 2 for disclaimers and trademarks with respect to IBHY and IBIG futures relating to and of Markit Indices Limited and BlackRock Fund Advisors.

The LMM Program currently expires on December 31, 2019, unless the LMM Program is extended by the Exchange. As is currently the case, CFE may determine to extend the term of the LMM Program and LMM appointments under the LMM Program, allow the LMM Program and LMM appointments under the LMM Program to expire, terminate the LMM Program and all LMM appointments under the LMM Program at any time, or replace the LMM Program with a different market maker program at any time. Any of the above actions, other than allowing the LMM Program to expire, would be done through a subsequent rule amendment submission to the Commission.

CFE believes that the Amendment is consistent with Designated Contract Market Core Principles 2 (Compliance with Rules), 4 (Prevention of Market Disruption), 9 (Execution of Transactions), and 12 (Protection of Markets and Market Participants) under Section 5 of the Act. All LMMs in the LMM Program are obligated by CFE Rule 308 to comply with Exchange rules and are required under the terms of the LMM Program to utilize Exchange match trade prevention functionality under CFE Rule 406B with respect to trading in CB Index futures. The Exchange also surveils for wash trading by LMM Program participants. Exchange rules include prohibitions against fraudulent, non-competitive, unfair, and abusive trading practices, and the Exchange monitors trading in CB Index futures for violative activity such as manipulative trading and market abuse. The Exchange believes that the amended LMM Program will have a positive impact on the price discovery process by fostering improved liquidity, market width and size, and volume in CB Index futures traded on CFE's centralized market and by incentivizing market participants to devote their efforts to enhancing market quality in CB Index futures. Enhanced market quality benefits all participants in the CB Index futures market. Accordingly, CFE believes that the impact of the Amendment will be beneficial to the public and market participants.

CFE is not aware of any substantive opposing views to the Amendment. CFE hereby certifies that the Amendment complies with the Act and the regulations thereunder. CFE further certifies that it has posted a notice of pending certification with the Commission and a copy of this submission on CFE's Web site (<http://cfe.cboe.com/aboutcfe/rules.aspx>) concurrent with the filing of this submission with the Commission.

Questions regarding this submission may be directed to Arthur Reinstein at (312) 786-7570 or Nicole Gordon at (312) 786-8109. Please reference our submission number CFE-2018-022 in any related correspondence.

Cboe Futures Exchange, LLC

[/s/ Matthew McFarland](#)

By: Matthew McFarland
Managing Director

EXHIBIT 1

(No changes are being made to the current description of the LMM Program below which is included in the Policies and Procedures Section of the CFE Rulebook)

Cboe Futures Exchange, LLC Policies and Procedures Section of Rulebook

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XV. Cboe® iBoxx® iShares® Bond Index Futures Lead Market Maker Program

The Cboe® iBoxx® iShares® Bond Index (“CB Index”) Futures Lead Market Maker Program (“Program”) is applicable with respect to CB Index futures.

Trading Privilege Holder (“TPH”) organizations may apply to the Exchange for appointment as a lead market maker (“LMM”) in the Program. The Exchange may approve up to five TPHs as LMMs in the Program. Any TPH that desires to apply for LMM status in the Program should submit an application in the form of a letter outlining the organization’s qualifications and commitments. TPHs shall be selected by the Exchange based on the Exchange’s judgment as to which applicants are most qualified to perform the functions of an LMM under the Program. Factors to be considered in making this selection may include, but are not limited to, satisfaction of the qualifications listed below as well as any one or more of the factors listed in Rule 515(b), as applied to LMM applicants instead of with respect to DPM applicants.

The following describes the qualifications, market performance benchmarks, benefits, and appointment term under the Program unless otherwise specified.

Qualifications

- Experience in trading the iShares® iBoxx® \$ High Yield Corporate Bond ETF and the iShares® iBoxx® \$ Investment Grade Corporate Bond ETF.
- Ability to automatically and systematically provide two-sided markets during CB Index futures trading hours.

Market Performance Benchmarks

- Each LMM shall identify in advance to the Exchange the EFIDs through which the LMM will provide Orders to satisfy the market performance benchmarks under the Program.
- Each LMM is required to utilize Exchange match trade prevention functionality under Rule 406B with respect to trading in CB Index futures.
- Each LMM shall provide Orders in CB Index futures in conformity with specified criteria relating to minimum two-sided quote size and maximum quote width. These criteria apply during CB Index futures trading hours.
- The Exchange may terminate, place conditions upon or otherwise limit a TPH’s appointment

as an LMM under the Program or reduce or not make payments to a TPH under the Program if the TPH fails to satisfy the market performance benchmarks under the Program. For example, the Exchange may reduce the applicable monthly incentive or revenue pool payment to a TPH under the Program through a proration that takes into consideration the extent to which the TPH did not satisfy market performance benchmarks under the Program during the applicable calendar month. However, failure of a TPH to satisfy the market performance benchmarks under the Program shall not be deemed a violation of Exchange rules.

Benefits

- An LMM is eligible to receive specified benefits in connection with acting as an LMM under the Program.

Term

- The Program and each LMM appointment under the Program will expire on December 31, 2019. The Exchange may determine to extend the term of the Program and LMM appointments under the Program, allow the Program and LMM appointments under the Program to expire, terminate the Program and all LMM appointments under the Program at any time or replace the Program with a different market maker program at any time.

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EXHIBIT 2

The iBoxx[®] iShares[®] \$ High Yield Corporate Bond Index and the iBoxx[®] iShares[®] \$ Investment Grade Corporate Bond Index (the “Indexes”) referenced herein are the property of Markit Indices Limited (“Index Sponsor”) and have been licensed for use in connection with Cboe[®] iBoxx[®] iShares[®] \$ High Yield Corporate Bond Index Futures and Cboe[®] iBoxx[®] iShares[®] \$ Investment Grade Corporate Bond Index Futures. Each party to a Cboe[®] iBoxx[®] iShares[®] \$ High Yield Corporate Bond Index Futures or Cboe[®] iBoxx[®] iShares[®] \$ Investment Grade Corporate Bond Index Futures transaction acknowledges and agrees that the transaction is not sponsored, endorsed or promoted by the Index Sponsor. The Index Sponsor makes no representation whatsoever, whether express or implied, and hereby expressly disclaims all warranties (including, without limitation, those of merchantability or fitness for a particular purpose or use), with respect to the Indexes or any data included therein or relating thereto, and in particular disclaims any warranty either as to the quality, accuracy and/or completeness of the Indexes or any data included therein, the results obtained from the use of the Indexes and/or the composition of the Indexes at any particular time on any particular date or otherwise and/or the creditworthiness of any entity, or the likelihood of the occurrence of a credit event or similar event (however defined) with respect to an obligation, in the Indexes at any particular time on any particular date or otherwise. The Index Sponsor shall not be liable (whether in negligence or otherwise) to the parties or any other person for any error in the Indexes, and the Index Sponsor is under no obligation to advise the parties or any person of any error therein.

The Index Sponsor makes no representation whatsoever, whether express or implied, as to the advisability of purchasing or selling Cboe[®] iBoxx[®] iShares[®] \$ High Yield Corporate Bond Index Futures or Cboe[®] iBoxx[®] iShares[®] \$ Investment Grade Corporate Bond Index Futures, the ability of the Indexes to track relevant markets’ performances, or otherwise relating to the Indexes or any transaction or product with respect thereto, or of assuming any risks in connection therewith. The Index Sponsor has no obligation to take the needs of any party into consideration in determining, composing or calculating the Indexes. No party purchasing or selling Cboe[®] iBoxx[®] iShares[®] \$ High Yield Corporate Bond Index Futures or Cboe[®] iBoxx[®] iShares[®] \$ Investment Grade Corporate Bond Index Futures, nor the Index Sponsor, shall have any liability to any party for any act or failure to act by the Index Sponsor in connection with the determination, adjustment, calculation or maintenance of the Indexes.

iBoxx[®] is a service mark of IHS Markit Limited.

The iBoxx[®] iShares[®] \$ High Yield Corporate Bond Index and the iBoxx[®] iShares[®] \$ Investment Grade Corporate Bond Index (the “Indexes”) and futures contracts on the Indexes (“Contracts”) are not sponsored by, or sold by BlackRock, Inc. or any of its affiliates (collectively, “BlackRock”). BlackRock makes no representation or warranty, express or implied to any person regarding the advisability of investing in securities, generally, or in the Contracts in particular. Nor does BlackRock make any representation or warranty as to the ability of the Indexes to track the performance of the fixed income securities market, generally, or the performance of HYG, LQD or any subset of fixed income securities.

BlackRock has not calculated, composed or determined the constituents or weightings of the fixed income securities that comprise the Indexes (“Underlying Data”). BlackRock is not responsible for and has not participated in the determination of the prices and amounts of the Contracts, or the timing of the issuance or sale of such Contracts or in the determination or calculation of the equation by which the Contracts are to be converted into cash (if applicable). BlackRock has no obligation or liability in connection with the administration or trading of the Contracts. BlackRock does not guarantee the

accuracy or the completeness of the Underlying Data and any data included therein and BlackRock shall have no liability for any errors, omissions or interruptions related thereto.

BlackRock makes no warranty, express or implied, as to results to be obtained by Markit or its affiliates, the parties to the Contracts or any other person with respect to the use of the Underlying Data or any data included therein. BlackRock makes no express or implied warranties and expressly disclaims all warranties of merchantability or fitness for a particular purpose or use with respect to the Underlying Data or any data included therein. Without limiting any of the foregoing, in no event shall BlackRock have any liability for any special, punitive, direct, indirect or consequential damages (including lost profits) resulting from the use of the Underlying Data or any data included therein, even if notified of the possibility of such damages.

iShares[®] is a registered trade mark of BlackRock Fund Advisors and its affiliates.