SUBMISSION COVER SHEET				
IMPORTANT: Check box if Confidential Treatment is requested  Registered Entity Identifier Code (optional): 20-452				
Organization: The Board of Trade of the City of Chicago, In	c. ("CBOT")			
Filing as a: DCM SEF DCO	SDR			
Please note - only ONE choice allowed.				
Filing Date (mm/dd/yy): October 15, 2020 Filing Description	ion: Modifications to the 3-			
Year Note Futures Market Maker Program				
SPECIFY FILING TYPE Please note only ONE choice allowed per Submission.				
Organization Rules and Rule Amendments				
	9.40.5( )			
Certification	§ 40.6(a)			
Approval	§ 40.5(a)			
Notification	§ 40.6(d)			
Advance Notice of SIDCO Rule Change	§ 40.10(a)			
SIDCO Emergency Rule Change	§ 40.10(h)			
Rule Numbers: Not Applicable				
New Product Please note only ONE	product per Submission.			
Certification	§ 40.2(a)			
Certification Security Futures	§ 41.23(a)			
Certification Swap Class	§ 40.2(d)			
Approval	§ 40.3(a)			
Approval Security Futures	§ 41.23(b)			
Novel Derivative Product Notification	§ 40.12(a)			
Swap Submission	§ 39.5			
Official Product Name:				
Product Terms and Conditions (product related Rules and I	Rule Amendments)			
Certification	§ 40.6(a)			
Certification Made Available to Trade Determination	§ 40.6(a)			
Certification Security Futures	§ 41.24(a)			
Delisting (No Open Interest)	§ 40.6(a)			
Approval	§ 40.5(a)			
Approval Made Available to Trade Determination	§ 40.5(a)			
Approval Security Futures	§ 41.24(c)			
Approval Amendments to enumerated agricultural products	§ 40.4(a), § 40.5(a)			
"Non-Material Agricultural Rule Change"	§ 40.4(b)(5)			
Notification	§ 40.6(d)			
Official Name(s) of Product(s) Affected:				
Rule Numbers:				



October 15, 2020

#### **VIA ELECTRONIC PORTAL**

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

RE: Modifications the 3-Year Note Futures Market Maker Program CBOT Submission No. 20-452

Dear Mr. Kirkpatrick:

The Board of Trade of the City of Chicago, Inc. ("CBOT" or "Exchange") hereby notifies the Commodity Futures Trading Commission ("CFTC" or "Commission") of plans to modify the 3-Year Note Futures Market Maker Program ("Program"). The modifications to the Program will become effective on November 1, 2020.

Exhibit 1 sets forth the terms of this Program. Modifications appear below, with additions <u>underlined</u> and deletions <del>overstruck</del>.

The Exchange reviewed the designated contract market core principles ("Core Principles") as set forth in the Commodity Exchange Act ("CEA" or "Act"). During the review, CBOT staff identified the following Core Principles as potentially being impacted: Monitoring of Trading, Execution of Transactions, Protection of Market Participants, Compliance with Rules, and Recordkeeping.

The Program does not impact the Exchange's ability to perform its trade practice and market surveillance obligations under the CEA and the Exchange's market regulation staff will monitor trading in the Program's products to prevent manipulative trading and market abuse. Additionally, the Exchange has implemented systems to track Program participants' obligations to ensure proper distribution of earned incentives. The incentives in the Program do not impact the Exchange's order execution. Participants in the Program will be selected by Exchange staff using criteria as further stated in Exhibit 1. Chapter 4 of the CBOT rules includes prohibitions against fraudulent, non-competitive, unfair or abusive practices. All participants must execute a contractual agreement with the Exchange in which each participant will expressly agree to comply with and be subject to applicable regulations and CBOT rules. The Program is subject to the Exchange's record retention policies which comply with the CEA.

CBOT certifies that the Program complies with the CEA and the regulations thereunder. There were no substantive opposing views to this Program.

The Exchange certifies that this submission has been concurrently posted on the Exchange's website at <a href="http://www.cmegroup.com/market-regulation/rule-filings.html">http://www.cmegroup.com/market-regulation/rule-filings.html</a>.

If you require any additional information regarding this submission, please e-mail <a href="mailto:CMEGSubmissionInquiry@cmegroup.com">CMEGSubmissionInquiry@cmegroup.com</a> or contact Rachel Johnson at 312-466-4393 or via e-mail at <a href="mailto:Rachel.Johnson@cmegroup.com">Rachel.Johnson@cmegroup.com</a>. Please reference our CBOT Submission No. 20-452 in any related correspondence.

Sincerely,

/s/ Christopher Bowen Managing Director and Chief Regulatory Counsel

Attachment: Exhibit 1

# **EXHIBIT 1**

# 3-Year Note Futures Market Maker Program

### **Program Purpose**

The purpose of this Program is to incent participants to build liquidity in the product listed below that is traded on the CME Globex Platform ("Globex"). A more liquid contract on the central limit order book benefits all participant segments in the market.

#### **Product Scope**

3-Year Treasury Note Futures ("Z3N") traded on Globex (the "Product").

# **Eligible Participants**

There is no limit to the number of participants that may participate in the Program. Participants may be CBOT members or non-members.

#### **Program Term**

Start date is July 13, 2020. End date is January 31, 2021 April 30, 2021.

#### Hours

Regular Trading Hours ("RTH"), 7:00AM – 4:00PM CT.

## **Obligations**

<u>Minimum Quoting Obligations</u>\*: In order to be eligible to receive Program incentives, participants must quote continuous two-sided markets in the Product at maximum bid/ask spreads and minimum quote sizes in accordance with the baseline quoting obligations listed below. Notwithstanding the foregoing, the Exchange may vary the baseline quoting obligations as it deems necessary based on ongoing evaluations of the Program.

Tier	Ticker	Width (Ticks, in 32nds)	Width (Index Pts)	Width (USD)	Size (Contracts)	Time in Market	Time Period
1 – Front Month	Z3N	0.5/32 <sup>nd</sup>	0.016	<del>\$15.625</del> <u>\$31.25</u>	60	<del>30%</del> <u>50%</u>	
2 – Front Month	Z3N	0.375/32 <sup>nd</sup>	0.012	\$11.71875 \$23.4375	80	65%	RTH
<u>2 –</u> <u>Calendar</u> <u>Spread</u>	<u>Z3N</u>	0.25/32 <sup>nd</sup>	0.008	<u>\$15.625</u>	<u>50</u>	<u>50%</u>	

<sup>\*</sup>Outright refers to the Front Month contract in the Roll Calendar. Roll Spread quoting is required for the last seven (7) trading days of Roll Calendar months (Feb, May, Aug, and Nov).

<u>Holiday Quoting Schedule</u>: There will be no quoting obligations on the dates listed below. The Holiday Quoting Schedule may be adjusted by the Exchange. Participants will be given notice of any adjustments to the Holiday Quoting Schedule.

Date	Holiday
9/7/2020	<del>Labor Day</del>
<del>10/12/2020</del>	Columbus Day
11/11/2020	Veteran's Day
11/26/2020	Thanksgiving
11/27/2020	Day After Thanksgiving
12/24/2020	Christmas Eve
12/25/2020	Christmas
1/1/2021	New Year's Day
1/18/2021	Birthday of Martin Luther King, Jr.
2/15/2021	Presidents' Day
4/2/2021	Good Friday

#### **Incentives**

<u>Member Fee Waivers</u>: Upon meeting the Minimum Quoting Obligations for either Tier 1 or Tier 2, member participants will receive fee waivers for Globex trades in the Product.

<u>Non-Member Fee Discounts</u>: Upon meeting the Minimum Quoting Obligations for either Tier 1 or Tier 2, non-member participants will receive a discounted rate of \$0.01 for Globex trades in the Product.

<u>Fee Credits</u>: Upon meeting the Minimum Quoting Obligations for Tier 2, participants will be eligible to receive Fee Credits in accordance with the table below:

Transaction Type	<u>Fee Credits</u> (per side)	<u>Cap</u>	
Calendar Spreads	<u>\$1.00</u>	#25 000 per month, per perticipant	
All Other Volume	<u>\$0.20</u>	- \$25,000 per month, per participan	

Date	Fee Credit (per side traded)	Cap
<del>July 13, 2020</del>	<del>\$2.00</del>	None
<del>July 14, 2020 – July 31, 2020</del>	<del>\$0.40</del>	None
August 1, 2020 and beyond	<del>\$0.20</del>	\$25,000 per month, per participant

Week 1 Incentive Pool (July 13, 2020 through July 17, 2020): Participants meeting the Minimum Quoting Obligations for Tier 2 during the month of July will be eligible for the Week 1 Incentive Pool. All eligible participants will be ranked by Globex volume in the Product for the week of July 13, 2020 through July 17, 2020. The top four (4) participants will receive a pro-rata distribution of \$50,000.

<u>Monthly Stipend (July 2020 through October 2020)</u>: Upon meeting the Minimum Quoting Obligations for Tier 2, participants will be eligible for a Monthly Stipend. Each month starting July 2020 through October 2020, all eligible participants will be ranked by Globex volume in the Product. The top four (4) participants each month will receive a stipend of \$10,000 per month, per participant. The Monthly Stipend will not be pro-rated for the month of July 2020.

#### Monitoring and Termination of Status

The Exchange shall monitor trading activity and participants' performance and shall retain the right to revoke participant status if it concludes from review that a participant no longer meets the requirements of the Program.

If the Exchange determines that a participant has not met its quoting obligations during one (1) calendar month over the course of the Program, but is within twenty percent (20%) of the time-in-market obligation, the participant will be eligible to receive the incentives for that applicable month.

If the Exchange determines that a participant has not met its quoting obligations during one (1) additional calendar month, the participant will be eligible to receive all incentives for that applicable month, with the exception of the Monthly Stipend.

Upon utilizing the exceptions set forth above, participants that fail to meet quoting obligations in any additional month may be removed from the Program.