



October 28, 2019

BY ELECTRONIC FILING

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 to the Eris Exchange Rulebook incorporating digital currency products and other changes (Eris Exchange, LLC Submission #2019-02)

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 amendments to Eris Exchange Rulebook. The proposed changes will become effective on November 11, 2019.

Explanation and Analysis

In preparation for the launch of futures trading on virtual currencies, Eris Exchange is amending its Rulebook to 1) incorporate rules related to direct (non-intermediated) market participants, 2) remove references to a regulatory service provider, 3) reference new product specifications for digital asset futures, 4) update the clearinghouse to Eris Clearing, LLC, 5) expand rules around manipulative conduct, and 6) update legal disclaimers. A copy of the rule changes were made available to staff in advance of this filing.

Description of Rule Changes

Rule 101 (“Definitions”) has been updated to define a “Direct Member,” as well as to identify Eris Clearing, LLC as the “Clearing House.” Modifications to Rule 101 also reflect changes in supported order types and order qualifiers. Additional changes have been made to clarify existing defined terms and to remove defined terms no longer relevant to the Exchange.

Rules have been modified to remove references to the use of a third-party “Regulatory Services Provider” (e.g., Rules 101, 209, 216, 308, 311, 402, 705, 710, 716, and 720). Additionally, the Rules surrounding “Participants” have been broadened to include Direct Members (e.g, Rules 101, 302, and 303).



Rule 509 (“Disruptive Trading Practices Prohibited”) has been broadened to include a prohibition on conduct, trading, or orders that “violates bids or offers,” demonstrates “intentional or reckless disregard for the orderly execution of transactions,” or “is of the character commonly known as ‘spoofing’.”

Additional and conforming changes have been made throughout the Rulebook.

The Exchange has attached a copy of the amended Rulebook hereto as Exhibit A.

Core Principle Compliance

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

Public Information

A copy of this submission has been concurrently posted on the Exchange’s website at <https://www.erisx.com/regulation/exchange-notices/> under “CFTC Submissions.”

Opposing Views

This submission was provided to 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,

A handwritten signature in black ink, appearing to read "D Karrow".

David Karrow
Chief Regulatory Officer and Senior Counsel
david.karrow@erisx.com
(312) 626-2692



Exhibit A

See attachment