

SUBMISSION COVER SHEET

IMPORTANT: Check box if Confidential Treatment is requested

Registered Entity Identifier Code (optional): 18-518

Organization: Chicago Mercantile Exchange Inc. ("CME")

Filing as a: DCM SEF DCO SDR

Please note - only ONE choice allowed.

Filing Date (mm/dd/yy): December 11, 2018 Filing Description: Modifications to the Eurodollar Pack and Bundle Deferred Contract Liquidity Program

Please note only ONE choice allowed per Submission.

Organization Rules and Rule Amendments

- | | | |
|-------------------------------------|-------------------------------------|------------|
| <input checked="" type="checkbox"/> | Certification | § 40.6(a) |
| <input type="checkbox"/> | Approval | § 40.5(a) |
| <input type="checkbox"/> | Notification | § 40.6(d) |
| <input type="checkbox"/> | Advance Notice of SIDCO Rule Change | § 40.10(a) |
| <input type="checkbox"/> | SIDCO Emergency Rule Change | § 40.10(h) |

Rule Numbers: N/A

New Product

Please note only ONE product per Submission.

- | | | |
|--------------------------|---------------------------------------|------------|
| <input type="checkbox"/> | Certification | § 40.2(a) |
| <input type="checkbox"/> | Certification Security Futures | § 41.23(a) |
| <input type="checkbox"/> | Certification Swap Class | § 40.2(d) |
| <input type="checkbox"/> | Approval | § 40.3(a) |
| <input type="checkbox"/> | Approval Security Futures | § 41.23(b) |
| <input type="checkbox"/> | Novel Derivative Product Notification | § 40.12(a) |
| <input type="checkbox"/> | Swap Submission | § 39.5 |

Official Product Name:

Product Terms and Conditions (product related Rules and Rule Amendments)

- | | | |
|--------------------------|---|----------------------|
| <input type="checkbox"/> | Certification | § 40.6(a) |
| <input type="checkbox"/> | Certification Made Available to Trade Determination | § 40.6(a) |
| <input type="checkbox"/> | Certification Security Futures | § 41.24(a) |
| <input type="checkbox"/> | Delisting (No Open Interest) | § 40.6(a) |
| <input type="checkbox"/> | Approval | § 40.5(a) |
| <input type="checkbox"/> | Approval Made Available to Trade Determination | § 40.5(a) |
| <input type="checkbox"/> | Approval Security Futures | § 41.24(c) |
| <input type="checkbox"/> | Approval Amendments to enumerated agricultural products | § 40.4(a), § 40.5(a) |
| <input type="checkbox"/> | "Non-Material Agricultural Rule Change" | § 40.4(b)(5) |
| <input type="checkbox"/> | Notification | § 40.6(d) |

Official Name(s) of Product(s) Affected:

Rule Numbers:

December 11, 2018

VIA ELECTRONIC PORTAL

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

**RE: Modifications to the Eurodollar Pack and Bundle Deferred Contract Liquidity Program
CME Submission No. 18-518**

Dear Mr. Kirkpatrick:

Chicago Mercantile Exchange Inc. ("CME" or "Exchange") hereby notifies the Commodity Futures Trading Commission ("CFTC" or "Commission") of plans to modify the Eurodollar Pack and Bundle Deferred Contract Liquidity Program ("Program"). The modifications to the Program will become effective on January 1, 2019.

Exhibit 1 sets forth the terms of this Program. Modifications appear below, with additions underlined and deletions ~~overstruck~~.

CME reviewed the designated contract market core principles ("Core Principles") as set forth in the Commodity Exchange Act ("CEA"). During the review, CME 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 all market participants that trade 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 CME 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 CME rules. The Program is subject to the Exchange's record retention policies which comply with the CEA.

CME certifies that this 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 <http://www.cmegroup.com/market-regulation/rule-filings.html>.

If you require any additional information regarding this submission, please e-mail CMEGSubmissionInquiry@cmegroup.com or contact Rachel Johnson at 312-466-4393 or via e-mail at Rachel.Johnson@cmegroup.com. Please reference our CME Submission No. 18-518 in any related correspondence.

Sincerely,

/s/ Christopher Bowen
Managing Director and Chief Regulatory Counsel

Attachment: Exhibit 1

EXHIBIT 1

Eurodollar Pack and Bundle Deferred Contract Liquidity Program

Program Purpose

The purpose of this Program is to develop increased liquidity and encourage trading in specific deferred month Eurodollar packs and bundles and their related Eurodollar futures contracts which are at present less liquid by comparison with the broader Eurodollar Futures complex. Increased liquidity in these contracts benefits the entire marketplace.

Product Scope

Eurodollar Pack and Bundle Futures contracts traded on Globex® (“Products”).

Eligible Participants

The Exchange may designate up to twenty (20) participants in the Program. Participants must be CME members. All prospective participants are required to submit a Bid Sheet to the Exchange which is used to determine eligibility. Exchange staff looks at a variety of factors when selecting participants including, but not limited to, historical performance in the Products or related markets, previous experience in trading and market making of deferred Eurodollar contracts, and the ability to commit to and maintain continuous two-sided markets in the Products.

Program Term

Start date is January 1, 2015. End date is ~~December 31, 2018~~ January 31, 2020.

Hours

7:00AM – 4:00PM CT

Obligations

In order to be eligible to receive Program incentives, Program participants must select and comply with one (1) set of quoting obligations such as the target obligations set forth in the Quoting Buckets below. Participants must comply with the selected quoting obligations for 65% of the applicable trading session each month.

Bucket 1		
Instrument	Max Spread	Contracts
3-Year Bundle	0.5	15
4-Year Bundle	0.5	10
5-Year Bundle	0.5	5
Green Pack	0.5	25
Blue Pack	0.5	15
Gold Pack	0.75	10

Bucket 2		
Instrument	Max Spread	Contracts
3-Year Bundle	0.5	20
4-Year Bundle	0.5	15
5-Year Bundle	0.5	15

Bucket 3		
Instrument	Max Spread	Contracts
Green Pack	0.5	50
Blue Pack	0.5	30
Gold Pack	0.75	30
Purple Pack	1.25	5

Bucket 4		
Instrument	Max Spread	Contracts
Green Pack	0.5	35
Blue Pack	0.5	35
Green/Blue	0.5	50
Blue/Gold	0.5	50

Bucket 5		
Instrument	Max Spread	Contracts
4-Year Bundle	0.5	15
5-Year Bundle	0.5	10
Blue Pack	0.5	15
Gold Pack	0.75	10
Purple Pack	1.25	5
Green/Blue PS	0.5	15
Blue/Gold PS	0.5	10
Gold/Purple PS	1.25	5

Holiday Quoting Schedule: There will be no quoting obligations on Saturdays, Sundays, Globex holidays, or 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	Quoting Obligation
<u>1/1/2019</u>	<u>New Year's Day</u>	<u>None</u>
<u>1/21/2019</u>	<u>Martin Luther King, Jr. Day</u>	<u>None</u>
<u>2/18/2019</u>	<u>President's Day</u>	<u>None</u>
<u>4/19/2019</u>	<u>Good Friday</u>	<u>None</u>
<u>5/27/2019</u>	<u>Memorial Day</u>	<u>None</u>
<u>7/4/2019</u>	<u>Independence Day</u>	<u>None</u>
<u>9/2/2019</u>	<u>Labor Day</u>	<u>None</u>
<u>10/14/2019</u>	<u>Columbus Day</u>	<u>None</u>
<u>11/11/2019</u>	<u>Veterans Day</u>	<u>None</u>
<u>11/28/2019</u>	<u>Thanksgiving</u>	<u>None</u>
<u>11/29/2019</u>	<u>Day After Thanksgiving</u>	<u>None</u>

<u>12/24/2019</u>	<u>Christmas Eve</u>	<u>None</u>
<u>12/25/2019</u>	<u>Christmas</u>	<u>None</u>
<u>1/1/2020</u>	<u>New Year's Day</u>	<u>None</u>
<u>1/20/2020</u>	<u>Martin Luther King, Jr. Day</u>	<u>None</u>

Program Incentives

Fee Discounts: Upon meeting all Program obligations, as determined by the Exchange, Program participants may be eligible to receive a \$0.08 discount on fees for applicable volume traded in the Products.

Fee Discount Credits: Upon meeting all Program obligations, as determined by the Exchange, Program participants may be eligible to receive fee discount credits which may be applied to certain fees incurred from other Eurodollar futures volume traded in the same month. Fee credits will have a value of \$0.06 each. Only one (1) credit may be applied for each non-Pack and Bundle Eurodollar Future traded.

Fee Discount Credit Multiplier Schedule*

Year Bracket of Contract Expiration Month	Fee Discount Credits/Leg
Green Packs / 3Y Bundles	7 fee credits (per leg)
Blue Packs and beyond / 4Y & 5Y Bundles	15 fee credits (per leg)

**In the case of applicable spread types that span multiple color years the color year of the longest component of the spread will determine the multiplier to be applied.*

Monitoring and Termination of Status

~~The Exchange shall monitor market making activity and shall retain the right to revoke Program participant status if it concludes from its review that a Program participant is not complying with Program obligations.~~

~~The Exchange's market regulation staff will monitor all market participants that trade the Program's products to prevent manipulative trading and market abuse. Additionally, the Exchange will remove self-matched trades from Program incentive calculations.~~

~~If the Exchange determines that a participant has not met its quoting obligations during the participant's first month of quoting, but is within twenty percent (20%) of its contracted quoting metric, the participant will be eligible to receive the incentives for that applicable month.~~

~~Excluding a participant's first month of quoting, if a participant does not meet its quoting obligations during one (1) calendar month, but is within ten percent (10%) of its contracted quoting metric, the participant will be eligible to receive the incentives for that applicable month. Participants must meet quoting obligations for all subsequent months in order to continue to receive the Program incentives.~~

~~Participants that fail to meet the Program obligations for three (3) consecutive months will be removed from the Program.~~

If the Exchange determines that a participant has not met its quoting obligations during two (2) calendar months over the course of the Program but is within twenty percent (20%) of the time-in-market obligations, the participant will be eligible to receive the incentives for each 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.

Participants must meet quoting obligations for all subsequent months in order to continue to receive the Program incentives.

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