

**SUBMISSION COVER SHEET**

**IMPORTANT:** Check box if Confidential Treatment is requested

Registered Entity Identifier Code (optional): 14-549 (2 of 4)

Organization: The Board of Trade of the City of Chicago, Inc. ("CBOT")

Filing as a:  DCM  SEF  DCO  SDR

Please note - only ONE choice allowed.

Filing Date (mm/dd/yy): December 15, 2014 Filing Description: Modifications to International Cross-Asset Volume Incentive Program

**SPECIFY FILING TYPE**

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: **Not Applicable**

**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:



Christopher Bowen  
Managing Director and Chief Regulatory Counsel  
Legal Department

December 15, 2014

**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 to the International Cross-Asset Volume Incentive Program  
CBOT Submission No. 14-549 (2 of 4)**

Dear Mr. Kirkpatrick:

Chicago Mercantile Exchange Inc. ("CME"), The Board of Trade of the City of Chicago, Inc. ("CBOT"), New York Mercantile Exchange, Inc. ("NYMEX"), and Commodity Exchange, Inc. ("COMEX") (collectively, the "Exchanges") hereby notify the Commodity Futures Trading Commission ("CFTC" or "Commission") of modifications to the International Cross-Asset Volume Incentive Program ("Program"). The proposed modifications to the Program will become effective on January 1, 2015.

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

The Exchanges reviewed the designated contract market core principles ("Core Principles") as set forth in the Commodity Exchange Act ("CEA"). During the review, the Exchanges' staff identified the following Core Principles as potentially being impacted; Prevention of Market Disruption, Execution of Transactions, Protection of Market Participants, Compliance with Rules, and Record Keeping.

The incentive structure of the Program and proposed modifications do not impact the Exchanges' ability to perform their trade practice and market surveillance obligations under the CEA. The Exchanges' market regulation staff will monitor trading in the Program's products to prevent manipulative trading and market abuse. The incentives in the Program do not impact the Exchanges' order execution. Participants in the Program will be selected by the Exchanges' staff using criteria as further stated in Exhibit 1. Chapter 4 of the Exchanges' rules includes prohibitions against fraudulent, non-competitive, unfair or abusive practices. The Program is subject to these rules. The Program and proposed modifications will be subject to the Exchanges' record retention policies which comply with the CEA.

CME, CBOT, NYMEX, and COMEX certify that the Program and proposed modifications comply with the CEA and the regulations thereunder. There were no substantive opposing views to this Program and the proposed modifications.

The Exchanges certify that this submission has been concurrently posted on the Exchanges' 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](mailto:CMEGSubmissionInquiry@cmegroup.com) or contact Rachel Johnson at 312-466-4393 or via e-mail at [Rachel.Johnson@cmegroup.com](mailto:Rachel.Johnson@cmegroup.com). Please reference our CBOT Submission No. 14-549 (2 of 4) in any related correspondence.

Sincerely,

/s/ Christopher Bowen  
Managing Director and Chief Regulatory Counsel

Attachment: Exhibit 1

# EXHIBIT 1

## INTERNATIONAL CROSS-ASSET INCENTIVE PROGRAM

### Program Purpose

The purpose of this Program is to incentivize high volume proprietary trading firms and trading arcades located outside North America to trade the products listed below on the CME Globex® Platform. The resulting increase in liquidity in the products listed below benefits all participant segments in the market.

### Product Scope

All CME, CBOT, and NYMEX futures and options products and all COMEX futures products that are available for trading on the Globex Platform; all CME and CBOT Interest Rate futures and options products available for trading via open outcry (collectively, the "Products").

The following products are included:

- All CME products available for trading on both the Globex® Platform and all open outcry and ex-pit transactions for Interest Rate futures and options products, which collectively, are currently eligible for the International Incentive Program ("IIP");
- All CBOT products available for trading on both the Globex® Platform and all open outcry and ex-pit transactions for Interest Rate futures and options products, which collectively, are currently eligible for IIP;
- The following NYMEX products available for trading on the Globex® Platform: Brent Crude Oil Penultimate Financial Futures; Brent Look-Alike Crude Oil Options; Short-Term Crude Oil Options; Light Sweet Crude Oil (WTI) Futures; WTI Look-Alike Options; Light Sweet Crude Oil Options; Gulf Coast Sour Crude Oil Futures; WTI Calendar Spread (1 Month) Options; Western Canadian Select (WCS) Crude Oil Futures; UxC Uranium U3O8 Futures; Henry Hub Natural Gas Calendar Spread (1 month) Options; Henry Hub Natural Gas Look-Alike Options; Henry Hub Natural Gas Futures; Henry Hub Natural Gas Options; Short-Term Natural Gas Options; Heating Oil Crack Spread Options; Heating Oil Calendar Spread Options; Heating Oil Futures; RBOB Gasoline Options; Heating Oil Options; RBOB Gasoline Futures; RBOB Gasoline Crack Spread Options; RBOB Gasoline Calendar Spread (1 month) Options; Platinum Futures; Palladium Futures; and
- The following COMEX products available for trading on the Globex® Platform: Gold Futures; Copper Futures; Silver Futures (collectively, the "Products").

### Eligible Participants

The Exchanges may select up to twenty-five (25) participants for the Program. There is no limit to the number of participants that may participate in the Program. Participants must be distinct legal entities located outside of North America who have registered for and are in good standing with the IIP. Wholly owned (100%) subsidiaries may register together for the Program. Separate firms (unless wholly owned subsidiaries) must be registered separately.

Additional Arcade Firm Requirements:

- Teams of individuals with joint profits and losses under a participating arcade firm must be registered and approved by the Exchanges to be eligible for discounted rates under the arcade

firm. Teams that adjust their legal status for the purpose of achieving lower combined rates may not be accepted into the Program. If firms have affiliates based in North America, they must apply for an exception.

- Individual traders under the participating arcade firm must either (i) be receiving less than eighty percent (80%) of profits and losses (as required under the IIP program); or (ii) be self-funded traders who:
  - Have primary income coming from trading;
  - Pay a desk fee;
  - Primarily trade from the physical location operated by the participating arcade firm;
  - Share risk with the participating arcade firm; and
  - Register with the Exchanges as “exempt traders” and the participant arcade firm makes the exempt trader available for product notices and education.

### **Program Term**

Start date is November 1, 2012. End date is ~~December 31, 2014~~ December 31, 2015.

### **Hours**

The incentives will apply to all trades made in the Products regardless of the execution time.

### **Program Incentives**

1. Fee Discounts: Participants in the Program that maintain an average daily volume (“ADV”) of 2,500 combined contract sides traded in CME, CBOT, and NYMEX futures and options traded on the Globex Platform and COMEX futures traded on the Globex Platform, will be eligible to receive the following fee discounts, in accordance with the tables below:

<b><u>Product Category</u></b> <b><u>CME Globex Only</u></b>	<b><u>IVIP All-in Fees</u></b> <b><u>(Per Side)</u></b>
<b><u>CME Products</u></b>	
<u>Agricultural – Futures*</u>	<u>\$0.81</u>
<u>Agricultural – Options*</u>	<u>\$0.81</u>
<u>Weather Contracts</u>	<u>\$0.245</u>
<u>Full Size Foreign Exchange – Futures*</u>	<u>\$0.54</u>
<u>Foreign Exchange – Variance Futures</u>	<u>\$0.07</u>
<u>Foreign Exchange – Options*</u>	<u>\$0.54</u>
<u>E-mini Foreign Exchange Contracts*</u>	<u>\$0.54</u>
<u>E-micro Foreign Exchange Contracts</u>	<u>\$0.10</u>
<u>Full Size Equity Index – Futures</u>	<u>\$1.05</u>
<u>Full Size Equity Index – Options</u>	<u>\$1.00</u>
<u>E-mini Equity Index – Futures*</u>	<u>\$0.51</u>
<u>E-mini Equity Index – Options</u>	<u>\$0.445</u>
<u>E-micro Equity Index Contracts</u>	<u>\$0.50</u>
<u>USD Ibovespa - Futures</u>	<u>\$1.26</u>
<u>Interest Rate Contracts*</u>	<u>\$0.46</u>
<u>Interest Rates Eurodollar and European Options<sup>1</sup></u>	<u>\$0.44</u>
<u>Fixed Income Index Products</u>	<u>\$0.59</u>
<b><u>CME Products (Bundle Futures Only)</u></b>	
<u>2-Year Eurodollar Bundle Futures</u>	<u>\$3.52</u>
<u>3-Year Eurodollar Bundle Futures</u>	<u>\$5.28</u>

<b>Product Category CME Globex Only</b>	<b>IVIP All-in Fees (Per Side)</b>
<u>5-Year Eurodollar Bundle Futures</u>	<u>\$8.80</u>
<u>2-Year Eurodollar Bundle Options</u>	<u>\$2.89</u>
<u>3-Year Eurodollar Bundle Options</u>	<u>\$4.22</u>
<u>5-Year Eurodollar Bundle Options</u>	<u>\$6.87</u>
<b>CBOT Products</b>	
<u>Full Size Agricultural Contracts</u>	<u>\$1.06</u>
<u>Mini Agricultural Contracts</u>	<u>\$0.90</u>
<u>ICS &amp; CS Agricultural Options</u>	<u>\$2.06</u>
<u>\$25 Dow Futures</u>	<u>\$0.90</u>
<u>\$10 Dow Products</u>	<u>\$0.57</u>
<u>Mini \$5 Dow Products</u>	<u>\$0.54</u>
<u>DJ U.S. Real Estate Index Futures</u>	<u>\$0.54</u>
<u>U.S. Treasury Futures<sup>1</sup></u>	<u>\$0.49</u>
<u>U.S. Treasury Options<sup>1</sup></u>	<u>\$0.49</u>
<u>Other Financial Products<sup>1</sup></u>	<u>\$0.49</u>
<u>Deliverable IR Swap Futures</u>	<u>\$0.49</u>

\*The products denoted with an asterisk above will be eligible for the additional CME Products Progressive Volume Discount Incentives listed in #2 below.

<b><u>NYMEX Products on CME Globex</u></b>	<b><u>IVIP All-in Fees (Per Side)</u></b>
<u>Core Energy (CL, LO, HO, OH, RB, OB, NG, LN, ON)</u>	<u>0.77</u>
<u>NYMEX Metals (PL, PA, PO, PAO)</u>	<u>0.77</u>
<u>All other Energy</u>	<u>Must be 10% greater than the highest member rate</u>
<u>All other Metals</u>	<u>Must be 10% greater than the highest member rate</u>
<b><u>COMEX Products on CME Globex - Futures Only</u></b>	
<u>Core Metal (GC, SI, HG)</u>	<u>0.88</u>
<u>Physical Metals (equal to or less than half of full size contract)</u>	<u>Member rate must be 25% less than non-member rate</u>
<u>Financial Metals</u>	<u>Member rate must be 25% less than non-member rate</u>

<b><u>Pit &amp; Ex-Pit Trading<sup>1*</sup></u></b>	<b><u>IVIP all-in fees (per side)</u></b>
<b><u>CME Products</u></b>	
<u>Interest Rate Contracts</u>	<u>\$0.46</u>
<b><u>CBOT Products</u></b>	
<u>U.S. Treasury Futures</u>	<u>\$0.46</u>
<u>U.S. Treasury Options</u>	<u>\$0.49</u>
<u>Other Financial Futures</u>	<u>\$0.36</u>
<u>Other Financial Options</u>	<u>\$0.49</u>

\*Above reflects total clearing/exchange fees;

Ex-Pit Surcharges also apply for Ex-Pit trades

4. 2. CME Products Progressive Volume Discount Incentives: Subject to the restrictions set forth in 2 #3 below, participants in the Program that maintain an average daily volume (“ADV”) of 2,500 combined contract sides traded in the respective CME Products on Globex denoted above (“Qualifying Participants”), measured over the applicable Qualifying Period may, during the corresponding Incentive Period (the Qualifying Periods and Corresponding Incentive Periods set forth in 1(a) below), receive progressive volume fee discounts for trades executed on Globex in the Products as set forth in 1 (b) below.
- a. *Qualifying Periods/Incentive Periods*. For the purposes of the progressive volume discount incentives, the Program’s Qualifying Periods and corresponding Incentive Periods are as follows:

Qualifying Period	Corresponding Incentive Period
July 16, 2013 <u>2014</u> -October 15, 2013 <u>2014</u>	November 1, 2013 <u>2014</u> -December 31, 2013 <u>2014</u>
September 16, 2013 <u>2014</u> -December 15, 2013 <u>2014</u>	January 1, 2014 <u>2015</u> -March 31, 2014 <u>2015</u>
December 16, 2013 <u>2014</u> -March 15, 2014 <u>2015</u>	April 1, 2014 <u>2015</u> -June, 30, 2014 <u>2015</u>
March 16, 2014 <u>2015</u> -June 15, 2014 <u>2015</u>	July 1, 2014 <u>2015</u> -September 30, 2014 <u>2015</u>
June 16, 2014 <u>2015</u> -September 15, 2014 <u>2015</u>	October 1, 2014 <u>2015</u> -December 31, 2014 <u>2015</u>

- b. *Progressive Volume Tiers*. During an applicable Incentive Period, Qualifying Participants may participate in the following progressive volume tiers to be calculated each respective calendar month over an Incentive Period. The progressive volume tier levels and corresponding ADV must be independently met for each of the respective product groups set forth in the table below (each a “Product Group”). ADV will not be combined across the Product Groups.

Min ADV (sides)	Max ADV (sides)	IR (All Venues)	FX	Equity	Energy	Ags
0	1000	\$0.44	\$0.54	\$0.50	\$0.75	\$0.81
1001	2000	\$0.30	\$0.40	\$0.41	\$0.65	\$0.55
2001	3000					
3001	5000	\$0.22	\$0.35	\$0.36	\$0.55	
5001	10000					
10001	20000					
20001	25000					
25001	50000					

CME Products IVIP (Excluding Bundle Futures)				
Tier Structure	Interest Rates	FX	Equity	Ags
<u>0 -1000</u>	<u>\$0.46</u>	<u>\$0.54</u>	<u>\$0.51</u>	<u>\$0.81</u>
<u>1001 - 5000</u>	<u>\$0.35</u>	<u>\$0.41</u>	<u>\$0.41</u>	<u>\$0.55</u>
<u>5001+</u>	<u>\$0.25</u>	<u>\$0.36</u>	<u>\$0.36</u>	

2. 3. Restrictions: Participants may choose to participate in the Program on a Product Group by Product Group basis, but must select which Product Groups they want to include under the Program when submitting their initial application. Participants may not receive incentives under the IIP for volumes in Products counted toward ~~the~~ this Program.

### **Monitoring and Termination of Status**

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