



Via Portal Submission

December 17, 2015

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

Re: OneChicago, LLC Rule Submission  
Issuing NTM 2015-47 (Large Trader Reporting Guide)  
(OCX Submission Number 15-018)

Dear Mr. Kirkpatrick:

Pursuant to section 5c(c)(1) of the Commodity Exchange Act, as amended (the “Act”), and § 40.6(a) of the regulations promulgated by the Commodity Futures Trading Commission (“CFTC” or the “Commission”) under the Act, OneChicago, LLC (“OneChicago,” “OCX,” or the “Exchange”) hereby submits the following Notice to Members (“NTM”), which will become effective on January 4, 2015.

NTM 2015-47 updates OneChicago’s Large Trader Reporting (“LTR”) guide, which is available on the Exchange’s public website. The guide provides OneChicago market participants with information regarding how to report large trader positions to the Exchange. OneChicago is updating the guide to remove references to the Securities Industry Automation Corporation (“SIAC”), which is no longer involved in OneChicago LTR. NTM 2015-47 is attached as Attachment A.

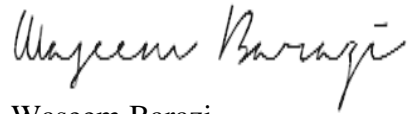
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The purpose of NTM 2015-47 is to update OneChicago’s LTR guide to remove references to SIAC. Comments on this NTM have not been solicited and none have been received. OneChicago is not aware of any substantive opposing views to this NTM. OneChicago certifies that the NTM complies with the Act, including the core principles, and the Commission’s regulations promulgated thereunder. OneChicago further certifies that a copy of this submission has been posted on the [OneChicago website](#). OneChicago staff has reviewed the core principles applicable to DCMs, and has concluded that the proposed NTM may have some bearing upon the following core principles:

*Core Principle 7:* Core Principle 7 requires DCMs to make available to market authorities, market participants, and the public accurate information concerning the rules and regulations for executing transactions on the contract market. NTM 2015-47 supports Core Principle 7 in that it makes market participants aware of OCX's LTR instructions.

If you have any questions or comments related to this filing, please feel free to contact me by telephone at (312) 883-3441 or through e-mail at [wbarazi@onechicago.com](mailto:wbarazi@onechicago.com).

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Waseem Barazi". The signature is fluid and cursive, with the first name "Waseem" being larger and more prominent than the last name "Barazi".

Waseem Barazi  
Chief Regulatory Officer and Associate General Counsel

Encl: Attachment A

**Attachment A**

(See Following Page)

Date: December 17, 2015  
Re: Large Trader Reporting Guide  
Effective Date: January 4, 2015

This Notice to Members (“NTM”) 2015-47 supersedes NTM 2010-12 to eliminate any references to the Securities Industry Automation Corporation (“SIAC”) and to provide an updated large trader reporting (“LTR”) guide. As of November 23, 2015, OneChicago, LLC (“OneChicago” or “OCX”) has eliminated the role of SIAC in LTR of OneChicago products.

### **Large Trader Position Reporting**

#### **Reporting Firms**

Exchange Clearing Members, Futures Commission Merchants (“FCMs”), broker-dealers (“BDs”), and foreign brokers (together, “Reporting Firms”) are required to report position information on behalf of customer accounts carried on their books that have a position at or above the reportable level of 200 contracts. Reporting Firms are required to report this large trader data to OneChicago and to the Commodity Futures Trading Commission (“CFTC”). OneChicago collects large trader data and transmits it to the CFTC on behalf of all Reporting Firms.

#### **Reportable Accounts**

A reportable account is any account, including customer, firm, or market maker that meets the reportable level. Each account that has been in reportable status must also be reported on the first day that it falls below the reportable level.

#### **Reportable Level**

For all OneChicago security futures products, the reportable level is 200 contracts on either side of the market in a single expiration/contract month. Once the 200-contract threshold level is met in any expiration/contract month, all other positions in the same contract in other expiration/contract months on the same exchange must be reported. The following is an example of when a report must be filed:

*Example:* An account establishes a position of 200 IBM June SSF contracts on OCX and also maintains positions of 50 IBM July and 100 IBM Sep SSFs contracts traded on OCX. The threshold level of 200 contracts is met in the IBM June SSF, so the entire position of 350 contracts must be reported.

## **Aggregated Accounts**

For purposes of determining whether a large trader meets the 200-contract reporting threshold, reporting firms must aggregate accounts with common ownership and/or trading control, and report the positions under one reporting account number. (See CFTC Reg. 17.00(b) for the rules on aggregating accounts for reporting purposes).

## **Methods of Reporting**

Firms carrying customer positions must report directly to OneChicago, which will report those positions to the CFTC. Reporting Firms can make arrangements with the OCC to report positions for accounts that clear in the Market Maker or Firm range at the OCC. For those firms submitting LTR to OneChicago, the reports must be submitted to OneChicago by 7:00 a.m. Central Time (8:00 a.m. Eastern Time).

## **Reporting Format**

Reporting Firms must report LTR data in the format required by the CFTC. Please see the CFTC website for specifications.

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Any questions regarding this NTM should be directed to OneChicago Operations at [operations@onechicago.com](mailto:operations@onechicago.com).