

**SUBMISSION COVER SHEET**

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

Registered Entity Identifier Code (optional): 19-483

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 16, 2019 Filing Description: Modifications to the CBOT Market Maker Program for Electronic Treasury Options

**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 16, 2019

**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 CBOT Market Maker Program for Electronic Treasury Options  
CBOT Submission No. 19-483**

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 CBOT Electronic Treasury Options Market Making Program ("Program"). The modifications to the Program will become effective on February 1, 2020.

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

CBOT reviewed the designated contract market core principles ("Core Principles") as set forth in the Commodity Exchange Act ("CEA"). 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 all 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 or the proposed extension.

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](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. 19-483 in any related correspondence.

Sincerely,

/s/ Christopher Bowen  
Managing Director and Chief Regulatory Counsel

Attachment: Exhibit 1

# EXHIBIT 1

## Market Maker Program for CBOT Electronic Treasury Options

### Program Purpose

The purpose of this Program is to enhance liquidity in Treasury Options products during RTH and ETH in order to increase the percentage of Treasury Options executed electronically. A more liquid contract benefits all participants in the market.

### Product Scope

All Options on CBOT Treasury futures, including 2, 5, and 10-Year U.S. Treasury Notes, 30-Year U.S. Treasury Bonds, Long Term U.S. Treasury Bonds, and Ultra 10-Year Notes\* (“Products”).

~~\*Beginning April 1, 2019, Ultra 10-Year Notes will be removed from the Program.~~

### Eligible Participants

The Program participants can be CBOT member or non-member firms. All firms that have a relationship with a clearing member firm and can meet CBOT established quoting requirements, including the ability to stream quotes in outright options and option strategies, may qualify for the Program. There is no limit to the number of Program participants.

### Program Term

Start date is March 2008. End date is ~~January 31, 2020~~ January 31, 2021.

### Hours

Extended and Regular Trading Hours (“ETH” and “RTH”).

### Obligations

*Quoting Requirements.* Participants are required to respond to Globex electronic Requests-for-Quotes (“RFQs”) in strategies of all or a subset of the Products. Participants may only quote up to the max order quantity on a single price level, and must set market maker protection values in line with quoted quantities. Additionally, participants must quote in accordance with the mass quote obligations and other associated market maker functionality parameters as determined by the Exchange and as published on the Exchange’s website.

### Program Incentives

1. Mass Quote Message. CBOT shall permit the market maker to submit quotes for the Product using the Mass Quote message under an assigned identification granted by CBOT staff.

2. Order Flow Allocation. The ~~six (6)~~ eight (8) most highly ranked Program participants in each Treasury option product shall receive order flow allocations in the applicable Treasury option product, per the schedule of “Evaluation and Incentive Allocation Periods.” In order to receive the allocation, the top ~~six (6)~~ eight (8) participants must respond to at least 60% of RFQs in a specific product or at least 50% of their Treasury options volume must be executed on Globex. The total order flow allocations shall not exceed 24% of total order flow in the applicable Treasury option product.

~~\*Beginning April 1, 2019, the Order Flow Allocation incentive will be granted to the eight (8) most highly ranked Program participants in accordance with the criteria set forth above.~~

The Exchange shall evaluate and rank Program participants quarterly with assignments of attendant rank-related Program incentives to take effect per the following schedule:

**Evaluation and Incentive Allocation Periods for 2, 5, and 10-Year U.S. Treasury Notes, 30 Year U.S. Treasury Bonds, and Long Term U.S. Treasury Bonds, and Ultra 10-Year Notes**

<b>Evaluation Period</b>	<b>Incentive Allocation Period</b>
9/16/2018 <u>2019</u> – 12/15/2018 <u>2019</u>	1/1/2019 <u>2020</u> – 3/31/2019 <u>2020</u>
12/16/2018 <u>2019</u> – 3/15/2019 <u>2020</u>	4/1/2019 <u>2020</u> – 6/30/2019 <u>2020</u>
3/16/2019 <u>2020</u> – 6/15/2019 <u>2020</u>	7/1/2019 <u>2020</u> – 9/30/2019 <u>2020</u>
6/16/2019 <u>2020</u> – 9/15/2019 <u>2020</u>	10/1/2019 <u>2020</u> – 12/31/2019 <u>2020</u>
9/16/2019 <u>2020</u> – 12/15/2019 <u>2020</u>	1/1/2020 <u>2021</u> – 3/31/2020 <u>2021</u>

Program participants shall be ranked on the basis of the speed of their responses, the width of their bid-offered price spreads, the sizes of their bids and offers, time persistence of their quoting in options, and their electronic volume within the weeklies, serial, and quarterly expiration months.

**Monitoring and Termination of Status**

The Exchange 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.