

SUBMISSION COVER SHEET

IMPORTANT: Check box if Confidential Treatment is requested

Registered Entity Identifier Code (optional): 19-504 (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 26, 2019 Filing Description: Modifications to the International Incentive Program

SPECIFY FILING TYPE

Please note only ONE choice allowed per Submission.

Organization Rules and Rule Amendments

- Certification § 40.6(a)
- Approval § 40.5(a)
- Notification § 40.6(d)
- Advance Notice of SIDCO Rule Change § 40.10(a)
- SIDCO Emergency Rule Change § 40.10(h)

Rule Numbers: Not Applicable

New Product

Please note only ONE product per Submission.

- Certification § 40.2(a)
- Certification Security Futures § 41.23(a)
- Certification Swap Class § 40.2(d)
- Approval § 40.3(a)
- Approval Security Futures § 41.23(b)
- Novel Derivative Product Notification § 40.12(a)
- Swap Submission § 39.5

Official Product Name:

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

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

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

Rule Numbers:

December 26, 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 International Incentive Program
CBOT Submission No. 19-504 (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 plans to modify the International Incentive Program ("Program" or "IIP"). The modifications to the Program will become effective on January 13, 2020.

Exhibit 1 sets forth the terms of the Program. Modifications appear below, with additions underlined 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: Monitoring of Trading, Execution of Transactions, Protection of Market Participants, Compliance with Rules, and Recordkeeping.

The Program does not incentivize manipulative trading or market abuse and does 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 products under the Program 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 and proposed modifications are 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.

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 CMESubmissionInquiry@cmegroup.com or contact Rachel Johnson at 312-466-4393 or via e-mail at Rachel.Johnson@cmegroup.com. Please reference our CBOT Submission No. 19-504 in any related correspondence.

Sincerely,

/s/ Christopher Bowen
Managing Director and Chief Regulatory Counsel

Attachment: Exhibit 1

EXHIBIT 1

INTERNATIONAL INCENTIVE PROGRAM

Program Purpose

The purpose of this Program is to incentivize 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 Certain CME, CBOT, NYMEX (~~excluding NYMEX emissions contracts~~), and COMEX products (~~excluding Metal options contracts~~) available for trading on the CME Globex® Platform, and all open outcry transactions for Foreign Exchange options and Interest Rate futures and options products (“Products”).

Eligible Participants

There is no limit to the ~~amount~~ number of participants that may be selected in the Program. All approved CME, CBOT, NYMEX and COMEX non-members may participate. Only proprietary trading firms and trading arcades located outside of North America and traders located outside of North America are eligible.

To qualify as a proprietary trading firm under IIP a firm must:

Be a legal entity that trades its own capital. Trading funds must be exclusively firm funds and all trading must be done in the firm’s accounts. Further, to qualify for IIP, a proprietary trading firm must meet the following criteria:

- All trading must be done in proprietary trading accounts held in the name of the firm.
- All trading must be done electronically by owners, employees or contractors of the firm.
- Only the firm’s capital can be at risk of loss; that is, no traders may make any trading capital contributions or payments to the firm nor have any capital at risk in connection with their trading of the firm’s proprietary accounts.
- All trading must be solely for the benefit of the firm. No other individuals or entities can have any ownership interest in these accounts.
- All funds contributed to and traded under the firm are subject to loss from any and all trading activity of the firm.
- All profits and losses of the account are booked to income of the firm.
- Net profits of the account after the distribution of trader incentives and deduction of expenses are taxed to the firm.

To qualify as a trading arcade under IIP a firm must:

Be a legal entity where individuals, whom are owners, employees or contractors of an entity, provide a legal, risk management and physical structure and trading facilities to traders in return for sharing of trading profits. Transactions must be executed in the name of accounts owned by the trading arcade and originate from the trading arcade facility or from a remote site connected to the trading arcade facility. The funds used for trading may be corporate pools of funds or commingled individual/corporate funds, of which the trading arcade must contribute at least 20% of the funds. Additionally:

- All trading must be done electronically by owners, employees or contractors of the firm.
- The trading arcade must participate in at least 20% of the profits/losses of the trading accounts.
- Individual traders may participate in no more than 80% of the profits/losses of the trading accounts.

- All trading is conducted in accounts of the trading arcade which are held in the name of the trading arcade.
- All funds contributed are at risk and subject to loss from any and all trading activity of the trading arcade. Thus, funds contributed by an individual trader are not only at risk and subject to loss from the individual's trading activity of the trading arcade account, but are at risk and subject to loss from any and all the trading activity of the trading arcade.

Program Term

Start date is December 16, 2011. End date is ~~January 31, 2020~~ January 31, 2021.

Hours

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

Obligations

For continued eligibility, IIP participants must maintain a combined average daily volume ("ADV") in the Products of 250 contracts (sides) ~~a day~~ measured over a given calendar quarter. Micro E-mini Equity Index products will be excluded from this ADV requirement.

Program Incentives

~~Once accepted into the Program, participants will be eligible to receive the following incentives:~~

Upon meeting all obligations, as determined by the Exchanges, participants will receive the following incentives beginning on February 1, 2020.

1. Fee Discounts: Participants will be eligible to receive fee discounts for the Products ~~that are traded on Globex®~~ in accordance with the following tables:

Product Category	IIP All-in Fees (Per Side)
CME Globex® Only	
CME Products	
Agricultural – Futures*	\$0.81 <u>\$0.82</u>
Agricultural – Options*	\$0.81 <u>\$0.82</u>
Weather Contracts	\$0.25 <u>\$0.26</u>
Full Size Foreign Exchange – Futures* (excluding FX Link)	\$0.54
Full Size Foreign Exchange – Futures via FX Link	\$0.60
Foreign Exchange – Options*	\$0.54
E-mini Foreign Exchange Contracts*	\$0.54
E-micro Foreign Exchange Contracts	\$0.10
Full Size Equity Index – Futures	\$1.10
Full Size Equity Index – Options	\$1.00 <u>\$1.01</u>
E-mini Equity Index – Futures* (<u>Outrights & Spreads</u>)	\$0.60 <u>\$0.62</u>
E-mini Equity Index – Options*	\$0.50
Micro E-Mini Equity Index Futures (<u>Outrights & Spreads</u>)	\$0.10

Product Category	IIP All-in Fees (Per Side)
CME Globex® Only	
Nikkei/TOPIX Futures (Outrights & Spreads)	\$1.10
Bitcoin Futures	\$4.50
Bitcoin Options (<i>Effective 1/13/2020</i>)	<u>\$4.50</u>
Interest Rate Futures Contracts*	\$0.50
Interest Rate Options*	\$0.50
CBOT Products	
Full Size Agricultural Contracts	\$1.06
Mini Agricultural Contracts	\$0.90
ICS & CS Agricultural Options	\$2.06
Mini \$5 Dow Products	\$0.60 <u>\$0.62</u>
Micro E-Mini Dow Futures	\$0.10
DJ U.S. Real Estate Index Futures	\$0.60 <u>\$0.62</u>
Eris Swap Futures	\$0.50
U.S. Treasury Futures	\$0.49
U.S. Treasury Options	\$0.49
Fed Fund Products	\$0.49
MAC Swap Futures	\$0.49

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

Product Category	IIP All-in Fees (Per Side)
NYMEX Products on CME Globex®	
Core Energy (CL, LO, HO, OH, RB, OB, NG, LN, ON)	\$0.90
NYMEX Metals (PL, PA)	\$0.95 <u>\$1.00</u>
All other Energy	Must be 10% greater than the highest member rate
All other Metals	Non-member rate must be at least 25% greater than the Member rate
COMEX Products on CME Globex® - Futures Only	
Core Metal (GC, SI, HG)	\$0.95 <u>\$1.00</u>
E-micro Gold (MGC)	<u>\$0.20</u>
1,000 oz. Silver (SIL)	<u>\$0.40</u>
Shanghai Gold (SGC, SGU)	<u>\$1.00</u>
Physical Metals (equal to or less than half of full size contract)	Non-member rate must be at least 25% greater than the Member rate
Financial Metals	Non-member rate must be at least 25% greater than the Member rate

Product Category	IIP All-in Fees
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Pit Trading	(Per Side)
CME Products	
Interest Rate Contracts*	\$0.50
Foreign Exchange Options*	\$0.54
CBOT Products	
U.S. Treasury Futures	\$0.49
U.S. Treasury Options	\$0.49
Fed Fund Futures	\$0.49
Fed Fund Options	\$0.49
MAC Swap Products	\$0.49

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

2. CME Products Progressive Volume Discount Incentives: Subject to the restrictions set forth in #3 below, participants in the Program that maintain an average daily volume (“ADV”) of 1,000 combined contract sides traded in the respective CME Products on Globex® denoted above are eligible to receive progressive volume fee discounts in those Products as set forth below.

CME Products for IIP (Excluding Bundle Futures)					
Tier Structure	Interest Rates	FX	e-Mini Equity Futures	e-Mini Equity Options	Ags
0 – 1000	\$0.50	\$0.54	\$0.60 <u>\$0.62</u>	\$0.50	\$0.81
1001 - 5000	\$0.35	\$0.41	\$0.41 <u>\$0.42</u>	\$0.40	\$0.55
5001+	\$0.25	\$0.36	\$0.36 <u>\$0.37</u>	\$0.36	

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 IVIP for volumes in Products counted toward 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.

If a participant does not meet the minimum volume requirements during one (1) calendar quarter of the Program, the participant will still be eligible to receive the incentives for that applicable quarter. In order to continue to receive the Program incentives, participants must meet the minimum volume requirements for all subsequent calendar quarters.