

SUBMISSION COVER SHEET

IMPORTANT: Check box if Confidential Treatment is requested

Registered Entity Identifier Code (optional): 24-272 (2 of 2)

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): 09/23/24 Filing Description: Expansion of the Block Trade Reporting Window for the S&P GSCI Commodity Index Futures, S&P GSCI ER Index Futures, Bloomberg Commodity Futures and Options, Bloomberg Roll Select Commodity Index Futures Contracts and Related Basis Trade at Index Close Functionality from Five (5) to Fifteen (15) Minutes

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: See filing.

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:

September 23, 2024

VIA ELECTRONIC PORTAL

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

**Re: CFTC Regulation 40.6(a) Certification. Expansion of the Block Trade Reporting Window for the S&P GSCI ER Index Futures, S&P GSCI Commodity Index Futures, Bloomberg Commodity Futures and Options, Bloomberg Roll Select Commodity Index Futures Contracts and Related Basis Trade at Index Close Functionality from Five (5) to Fifteen (15) Minutes.
CBOT Submission No. 24-272 (2 of 2)**

Dear Mr. Kirkpatrick:

Chicago Mercantile Exchange Inc. (“CME”) and The Board of Trade of the City of Chicago, Inc. (“CBOT”) (collectively, the “Exchanges”) certify to the Commodity Futures Trading Commission (“CFTC” or the “Commission”) the expansion of the block trade reporting window for the S&P GSCI Commodity Index Futures, S&P GSCI ER Index Futures, Bloomberg Commodity Futures and Options and Bloomberg Roll Select Commodity Index Futures Contracts (the “Contracts”) and associated Basis Trade at Index Close (“BTIC”) functionality as noted in Table 1. below from five (5) to fifteen (15) minutes effective Sunday, October 13, 2024, for first trade date Monday, October 14, 2024.

Table 1.

Contract Title	Rulebook Chapter	CME Globex Code and CME ClearPort Code or BTIC Code	Block Trade Minimum Threshold	Current Block Trade Reporting Window	Expanded Block Trade Reporting Window
S&P GSCI ER Index Futures	CME 415	GA	50 contracts	5 minutes	<u>15 minutes</u>
BTIC on S&P GSCI ER Index Futures	CME 415	GIT	50 contracts	5 minutes	<u>15 minutes</u>
S&P GSCI Commodity Index Futures	CME 401	GI	50 contracts	5 minutes	<u>15 minutes</u>
BTIC on S&P GSCI Commodity Index Futures	CME 401	GDT	50 contracts	5 minutes	<u>15 minutes</u>
Bloomberg Commodity Index Futures	CBOT 29	AW/70	50 contracts	5 minutes	<u>15 minutes</u>
Options on Bloomberg Commodity Index Futures*	CBOT 29B	AW/70	50 contracts	5 minutes	<u>15 minutes</u>

BTIC on Bloomberg Commodity Index Futures	CBOT 29	AWT	50 contracts	5 minutes	<u>15 minutes</u>
Bloomberg Roll Select Commodity Index Futures	CBOT 29D	DRS	50 contracts	5 minutes	<u>15 minutes</u>
BTIC on Bloomberg Roll Select Commodity Index Futures	CBOT 29D	DRT	50 contracts	5 minutes	<u>15 minutes</u>

*The Options on Bloomberg Commodity Index Futures contract will be initially listed for trading and clearing effective on trade date September 23, 2024 and will be subject to a block trade reporting window of 5 minutes (see CFTC Filing [24-282](#) dated September 6, 2024). Effective trade date October 14, 2024, the block trade reporting window for the Options on the Bloomberg Commodity Index Futures contract will be expanded to 15 minutes as noted in the Table 1. above.

The 15-minute block trade reporting window shall apply to all trading hours.

Upon review the Exchanges note an increased institutional need for sophisticated strategies which may often require the execution of multi-leg block transactions. The Rule Amendments are intended to provide market participants sufficient time to report block transactions to the Exchanges across all time zones and harmonize such reporting requirements with other Exchange products.

The Exchange reviewed the designated contract market (“DCM”) core principles (“Core Principles”) as set forth in the Commodity Exchange Act (“Act”) and identified that the Rule Amendments may have some bearing on the following Core Principles:

- **Compliance with Rules:** The Exchanges provide guidance to the marketplace on the regulatory requirements attendant to block trades. This guidance is intended to assist market participants in remaining in compliance with Rule 526. (“Block Trades”) and is therefore in compliance with this Coe Principle.
- **Availability of General Information:** The Exchange will release a Special Executive Report (“SER”) regarding the Rule Amendments. The SER will also be posted on the CME Group website.
- **Execution of Transactions:** The Rule Amendments comply with this Core Principle and CFTC Regulation 1.38 (Execution of transactions), which allow DCMs to authorize transactions that are executed away from the DCM’s centralized marketplace based on terms specified by the DCM and submitted to the Commission.

Pursuant to Section 5c(c) of the Act and CFTC Regulation 40.6(a), the Exchange hereby certifies that the Rule Amendments comply with the Act., including regulation under the Act. There were no opposing views to the proposal.

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>.

Should you have any questions concerning the above, please contact the undersigned at (312) 466-7478 or via e-mail at CMEGSubmissionInquiry@cmegroup.com.

Sincerely,

/s/ Timothy Elliott
Managing Director and Chief Regulatory Counsel