

SUBMISSION COVER SHEET

IMPORTANT: Check box if Confidential Treatment is requested

Registered Entity Identifier Code (optional): 24-419

Organization: Chicago Mercantile Exchange Inc. ("CME")

Filing as a: DCM SEF DCO SDR

Please note - only ONE choice allowed.

Filing Date: 10/28/24 Filing Description: Reduction of the Minimum Trade Minimum Threshold of all Options on E-mini Nasdaq-100 Index Futures Contracts

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:

October 28, 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, D.C. 20581

Re: CFTC Regulation 40.6(a) Certification. Reduction of the Block Trade Minimum Threshold of all Options on E-mini Nasdaq-100 Index Futures Contracts. CME Submission No. 24-419

Dear Mr. Kirkpatrick:

Chicago Mercantile Exchange Inc. (“CME” or “Exchange”) is certifying to the Commodity Futures Trading Commission (“CFTC” or “Commission”) a reduction of the block trade minimum quantity threshold of all Options on the E-mini Nasdaq-100 Index Futures contracts (CME Rulebook Chapter [359A](#)) in the table below (the “Contracts”) (collectively, the “Rule Amendments”) effective on Sunday, November 24, 2024, for trade date Monday, November 25, 2024.

Table 1.

Contract Title	CME Globex and CME ClearPort Code	Reporting Window	Reduced Block Trade Minimum Threshold
Options on E-mini Nasdaq-100 Index Futures	NQ	15	60 <u>20</u>
Options on E-mini Nasdaq-100 Index Futures - End-of-Month (European-Style)	QNE	15	60 <u>20</u>
Monday Weekly Options on E-mini Nasdaq-100 Index Futures - Week 1-5 (European-Style)	Q1A-Q5A	15	60 <u>20</u>
Tuesday Weekly Options on E-mini Nasdaq-100 Index Futures - Week 1-5 (European-Style)	Q1B-Q5B	15	60 <u>20</u>
Wednesday Weekly Options on E-mini Nasdaq-100 Index Futures - Week 1-5 (European-Style)	Q1C-Q5C	15	60 <u>20</u>

Thursday Weekly Options on E-mini Nasdaq-100 Index Futures - Week 1-5 (European-Style)	Q1D-Q5D	15	60 <u>20</u>
Friday Weekly Options on E-mini Nasdaq-100 Index Futures - Week 1-4 (European-Style)	QN1-QN4	15	60 <u>20</u>

The Exchange is implementing the Rule Amendments based on its recent analysis of the Contracts' average order size and average trade size. The Exchange does not expect the reduced block trade minimum threshold to adversely impact participation in the centralized markets for the Contracts.

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

Availability of General Information: As required by this Core Principle, the Exchange will publish a Special Executive Report ("SER") to advise the marketplace of the Rule Amendments. The SER will also be available on the CME Group website.

Daily Publication of Trading Information: Block trade volume and pricing information will continue to be published on the Exchange's website and via quote vendors.

Execution of Transactions: A designated contract market may authorize transactions that are executed away from the DCM's centralized marketplace for bona fide business purposes. Accordingly, the Exchange has long established block standards for a wide array of futures and options products. The actions certified herein serve solely to improve the alignment of block trade standards for the pertinent futures products.

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 and regulations thereunder. There were no substantive opposing views to the Rule Amendments.

The Exchange certifies that this submission has been concurrently posted on the CME Group website at <http://www.cmegroup.com/market-regulation/rule-filings.html>

If you require any additional information regarding this submission, please contact the undersigned at (312) 466-7478 or via email at CMEGSubmissionInquiry@cmegroup.com.

Sincerely,

/s/ Timothy Elliot
Managing Director and Chief Regulatory Counsel