

November 4, 2024
BY ELECTRONIC FILING
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: BTNL 2024-006 - Self-Certification Pursuant to CFTC Regulation 40.6 –
Bitnomial Exchange, LLC HUP Exchange Fee Holiday Program**

Dear Mr. Kirkpatrick:

Bitnomial Exchange, LLC (“Bitnomial” or the “Exchange”) hereby submits for self-certification to the Commodity Futures Trading Commission (the “Commission” or “CFTC”), under Commission regulation 40.6(a), the following plan to create the Hashrate US Dollar Petahash Futures (“HUP”) Exchange Fee Holiday Program (the “Program”). The Program will become effective on November 19, 2024.

Purpose

The Program seeks to incentivize HUP trading volume and liquidity.

Eligibility

This Program is open to all Participants, Clearing Members, and Customers who wish to trade the HUP contract.

Incentives

All Exchange fees (currently \$10 per contract per side) will be waived for a period of six months. Participants, Clearing Members, and Customers will not be charged Exchange fees to trade the HUP contract.

Term

The Program begins on November 19, 2024, and expires on May 19, 2025.

Core Principal Compliance

Bitnomial has concluded that its compliance with DCM Core Principles is not adversely affected by creating the Program. The Exchange will continue to comply with all DCM Core Principles. The Exchange has reviewed the Core Principles as set forth under Section 5 of the Commodity Exchange Act, as amended (the “Act”), and determined that the following Core Principles may be impacted by Program:

Core Principal 2- *Compliance with Rules:*

The Program has been established under Bitnomial Rule 314 which allows the Exchange to create programs that provides incentives to Participants, Clearing Members, and Customers willing to add liquidity to Bitnomial markets.

Core Principle 4 - *Prevention of Market Disruption:*

The Program conforms with Core Principle 4 and CFTC Regulation 38.251, which expressly provide that a DCM must adopt and implement rules governing market participants subject to its jurisdiction to prevent, detect, and mitigate market disruptions or system anomalies associated with electronic trading.

Core Principal 7 - *Availability of General Information:*

Notification of the existence of the Program has been posted to <https://bitnomial.com/exchange/regulation/> in compliance with this Core Principal. Interested parties may contact the Exchange for additional information concerning the Program.

Core Principal 9 – *Execution of Transactions:*

The product included in the Program is listed for trading in competitive, open, and efficient markets.

Core Principal 12 - *Protection of Markets and Market Participants:*

The Program will have no effect on the Exchange’s duties to protect its markets and market participants from abusive, disruptive, fraudulent, noncompetitive and unfair conduct and trade practices.

Core Principal 18 – *Recordkeeping:*

The Exchange is committed to its duties to maintain records pertaining to the Program in a manner that satisfies the relevant criteria set forth in §1.31 of the Commission’s Regulations.

Core Principle 21, *Financial Resources:*

The Program will not impact the Exchange’s ability to discharge its financial, operational, or managerial responsibilities as a DCM.

Certification

Pursuant to Section 5c(c) of the Act and CFTC Regulation 40.6(a), Bitnomial certifies that the creation of the Program complies with the Act and regulations thereunder. Bitnomial is not aware of any opposing views to the creation of the Program.

Bitnomial certifies that a copy of this submission has been concurrently posted on the Exchange’s website at <https://bitnomial.com/exchange/regulation/>.

If you have any questions or require further information, please contact the undersigned at james.walsh@bitnomial.com.



Sincerely, /s/

James A. Walsh
Chief Regulatory Officer
Bitnomial Exchange, LLC