

SUBMISSION COVER SHEET

IMPORTANT: Check box if Confidential Treatment is requested

Registered Entity Identifier Code (optional): 24-414 (1 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): 11/21/24 Filing Description: Derived Block Eligibility and Decrease of Minimum Price Increment for the Three (3) Bloomberg Credit Futures Contracts for Transactions Submitted for Clearing via CME ClearPort

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: See filing.

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 |

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:

November 21, 2024

VIA ELECTRONIC PORTAL

Mr. Christopher J. Kirkpatrick
Office of the Secretariat
Commodity Futures Trading Commission
3 Lafayette Center
1155 21st Street NW
Washington, DC 20581

Re: CFTC Regulation 40.6(a). Certification. Derived Block Eligibility and Decrease of Minimum Price Increment for the Three (3) Bloomberg Credit Futures Contracts for Transactions Submitted for Clearing via CME ClearPort. CBOT Submission No. 24-414 (1 of 2)

Dear Mr. Kirkpatrick:

The Board of Trade of the City of Chicago, Inc. (“CBOT” or “Exchange”) certifies to the Commodity Futures Trading Commission (“CFTC” or “Commission”) the enablement of derived block functionality and decrease of the minimum price increment for transactions submitted for clearing via CME ClearPort for Bloomberg U.S. Corporate Investment Grade Index Futures, Bloomberg U.S. Corporate High Yield Very Liquid Index Futures, and Bloomberg U.S. Corporate Investment Grade Duration-Hedged Index Futures contracts (the “Contracts”) effective on Sunday, December 15, 2024 for trade date Monday, December 16, 2024, as more specifically described in the table below (collectively, the “Rule Amendments”).

Contract Title	Rulebook Chapter	Commodity Code	Current Minimum Price Increment CME ClearPort	Decreased Minimum Price Increment CME ClearPort
Bloomberg U.S. Corporate Investment Grade Index Futures	90	IQB	0.50 Index points, equal to \$15.00 per contract	<u>0.01 Index points, equal to \$0.30 per contract</u>
Bloomberg U.S. Corporate High Yield Very Liquid Index Futures	91	HYB	0.10 Index points, equal to \$15.00 per contract	<u>0.01 Index points, equal to \$1.50 per contract</u>
Bloomberg U.S. Corporate Investment Grade Duration-Hedged Index Futures	92	DHB	0.05 Index points, equal to \$25.00 per contract	<u>0.01 Index points, equal to \$5.00 per contract</u>

The minimum block threshold for the Contracts is 100 contracts.

In order to enable derived block eligibility of the Contracts, the Exchange is concurrently implementing amendments to CBOT Rule 9X102.C. (“Price Increments”) of CBOT Chapters 90, 91, and 92 to decrease the minimum price fluctuation for transactions submitted for clearing via CME ClearPort.

Appendix A below provides amendments to CBOT Rule 9X102.C. In blackline format.

The Exchange is implementing the Rule Amendments to better accommodate market participants with transactions of large quantities.

The Exchange reviewed the designated contract market core principles (“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: The Exchange will release a Special Executive Report (“SER”) regarding the Rule Amendments. The SER will also be posted on the CME Group website.

Daily Publication of Trading Information: The Exchange will continue to publish contract trading volumes, open interest levels, and price information daily on its website and through quote vendors for the Contracts.

Prevention of Market Disruption: Trading in the Contracts will continue to be subject to the rules of the Exchange, which include prohibitions on manipulation, price distortion, and disruption to the cash settlement process

Compliance with Rules: The Exchange will continue its normal practice to establish, monitor, and enforce compliance with the rules of the Contracts, including the reduction of the minimum price increment for the Contracts.

Pursuant to Section 5c(c) of the Act and CFTC Regulation 40.6(a), the Exchange certifies that the Rule Amendments comply with the Act and regulations thereunder. There were no substantive opposing views to this proposal.

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

Attachment: Appendix A Amendments to CBOT Rulebook Chapters 90, 91, and 92
(blackline format)

Appendix A

CBOT Rulebook

(additions underscored)

Chapter 90

Bloomberg U.S. Corporate Investment Grade Index Futures

90102. TRADING SPECIFICATIONS

90102.C. Price Increments

Bids and offers shall be quoted in Index points. The minimum price increment for transactions on CME Globex shall be 0.50 Index points, equal to \$15.00 per contract. For transactions submitted for clearing via CME ClearPort, the minimum price increment shall be 0.01 Index points, equal to \$0.30 per contract.

[Remainder of Rule unchanged.]

Chapter 91

Bloomberg U.S. Corporate High Yield Very Liquid Index Futures

91102. TRADING SPECIFICATIONS

91102.C. Price Increments

Bids and offers shall be quoted in Index points. The minimum price increment for transactions on CME Globex shall be 0.10 Index points, equal to \$15.00 per contract. For transactions submitted for clearing via CME ClearPort, the minimum price increment shall be 0.01 Index points, equal to \$1.50 per contract.

[Remainder of Rule unchanged.]

Chapter 92

Bloomberg U.S. Corporate Investment Grade Duration-Hedged Index Futures

92102. TRADING SPECIFICATIONS

92102.C. Price Increments

Bids and offers shall be quoted in Index points. The minimum price increment for transactions on CME Globex shall be 0.05 Index points, equal to \$25.00 per contract. For transactions submitted for clearing via CME ClearPort shall be 0.01 Index points, equal to \$5.00 per contract.

[Remainder of Rule unchanged.]