

Timothy Elliott Managing Director and Chief Regulatory Counsel Legal Department

December 2, 2024

#### VIA ELECTRONIC PORTAL

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

#### RE: Modifications to the IPOX Futures Fee Discount Program CME Submission No. 24-482

Dear Mr. Kirkpatrick:

Chicago Mercantile Exchange Inc. ("CME" or "Exchange") hereby notifies the Commodity Futures Trading Commission ("CFTC" or "Commission") of plans to modify the IPOX Futures Fee Discount Program ("Program"). The modifications to the Program will become effective on February 1, 2025.

Exhibit 1 sets forth the terms of the Program. Modifications appear below, with additions <u>underlined</u> and deletions <del>overstruck</del>.

The Exchange reviewed the designated contract market core principles ("Core Principles") as set forth in the Commodity Exchange Act ("CEA"). During the review, Exchange staff identified the following Core Principles as potentially being impacted: Monitoring of Trading, Execution of Transactions, Protection of Market Participants, Availability of General Information, Compliance with Rules, and Recordkeeping.

The Program does not incentivize manipulative trading or market abuse or impact the Exchange's ability to perform its trade practice and market surveillance obligations under the CEA. The Exchange's market regulation staff will monitor trading in the Program's products to prevent manipulative trading and market abuse. The Program does not impact the Exchange's order execution. Chapter 4 of the Exchange's rules includes prohibitions against fraudulent, non-competitive, unfair or abusive practices. The Program is subject to these rules and the Exchange's records retention policies that comply with the CEA.

The Exchange certifies that the Program complies with the CEA and the regulations thereunder. There were no substantive opposing views to this Program.

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

If you require any additional information regarding this submission, please e-mail <u>CMEGSubmissionInquiry@cmegroup.com</u> or contact Rachel Johnson at 312-466-4393 or via e-mail at <u>Rachel.Johnson@cmegroup.com</u>.

Sincerely,

/s/ Timothy Elliott Managing Director and Chief Regulatory Counsel

Attachment: Exhibit 1

# **EXHIBIT 1**

# **IPOX Futures Fee Discount Program**

## Program Purpose

The purpose of this Program is to encourage participants to build liquidity the product listed below. A more liquid contract benefits all participants in the marketplace.

#### Product Scope

All E-mini IPOX 100 U.S. Index Futures (the "Product").

#### Eligible Participants

There is no limit to the number of participants in the Program. Participants may be members or nonmembers. The incentives described below will be automatically applied to all transactions in the Product made by market participants.

#### Program Term

Start date is March 30, 2020. End date is January 31, 2025 January 31, 2027, or the date on which the Exchange determines to modify, extend, or terminate the Program. Participants will be given notice of any changes to the Program Term.

## <u>Hours</u>

N/A

#### Incentives

Fee Discounts: All market participants will receive 50% fee discounts on all transactions in the Product.