



December 6, 2024

Christopher J. Kirkpatrick  
Secretary  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, D.C. 20581

Re: Cboe Futures Exchange, LLC Rule Certification  
Submission Number CFE-2024-034

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (“Act”), and Regulation 40.6(a) promulgated by the Commodity Futures Trading Commission (“CFTC” or “Commission”) under the Act, Cboe Futures Exchange, LLC (“CFE” or “Exchange”) hereby submits a CFE rule amendment (“Amendment”) to revise the minimum Block Trade size for Cboe S&P 500 Variance (“VA”) futures. Exhibit 1 to this submission sets forth the rule changes included in the Amendment. The Amendment will become effective on or after January 1, 2025, on a date to be announced by the Exchange through the issuance of an Exchange notice.

CFE Rule 2302(n) (Block Trades) currently provides that the minimum Block Trade quantity for VA futures is 1,500 contracts if there is only one leg involved in the trade. Rule 2302(n) also provides that if a Block Trade is executed as a spread transaction with multiple legs, each leg must meet the minimum Block Trade quantity for VA futures. A Block Trade may not be executed in VA futures as a spread transaction referred to as a strip that is exclusively for the purchase or exclusively for the sale of multiple VA futures legs.

CFE is revising the minimum Block Trade size in VA futures to 500 contracts. Specifically, CFE is amending Rule 2302(n) to provide that the minimum Block Trade quantity for VA futures is 500 contracts if there is only one leg involved in the trade. Rule 2302(n) will continue to provide that if a Block Trade is executed as a spread transaction with multiple legs, each leg must meet the minimum Block Trade quantity for VA futures. Rule 2302(n) will also continue to provide that a Block Trade in VA futures may not be executed as a strip.

CFE believes that the Amendment is consistent with the Designated Contract Market (“DCM”) Core Principles under Section 5 of the Act. In particular, CFE believes that the Amendment is consistent with (i) DCM Core Principle 7 (Availability of General Information) because the Amendment includes in CFE’s rules what the minimum Block Trade size is for VA futures; and (ii) DCM Core Principle 9 (Execution of Transactions) in that the Amendment contributes to the provision by CFE of a competitive, open, and efficient market and mechanism for executing transactions in VA futures that protects the price discovery process of trading in the centralized market for VA futures.

CFE is making the Amendment in conjunction with revisions that CFE is making to its lead

market maker (“LMM”) program for VA futures (“LMM Program”). CFE is amending the LMM Program through a separate rule certification submission to the Commission to become effective on January 1, 2025 which is amending the market performance benchmarks for LMMs under the LMM Program. CFE believes that 500 contracts will be larger than the size at which a single buy or sell order will customarily be able to be filled in its entirety in VA futures on CFE’s centralized market without incurring a substantial price concession following the effectiveness of the amendments to the LMM Program.

CFE believes that the impact of the Amendment will be beneficial to the public and market participants. CFE is not aware of any substantive opposing views to the Amendment. CFE hereby certifies that the Amendment complies with the Act and the regulations thereunder. CFE further certifies that CFE has posted a notice of pending certification with the Commission and a copy of this submission on CFE’s website ([http://www.cboe.com/us/futures/regulation/rule\\_filings/cfe/](http://www.cboe.com/us/futures/regulation/rule_filings/cfe/)) concurrent with the filing of this submission with the Commission.

Questions regarding this submission may be directed to Arthur Reinstein at (312) 786-7570 or Shane Wilkerson at (484) 798-9350. Please reference our submission number CFE-2024-034 in any related correspondence.

Cboe Futures Exchange, LLC

*/s/ Laura Fuson*

By: Laura Fuson  
Managing Director

## EXHIBIT 1

The Amendment, marked to show additions in underlined text and deletions in ~~stricken~~ text, consists of the following:

\* \* \* \* \*

### Cboe Futures Exchange, LLC Rules

\* \* \* \* \*

#### 2302. Contract Specifications

(a) - (m) No changes.

(n) *Block Trades.* Pursuant to Rule 415(a)(i), the minimum Block Trade quantity for VA futures is ~~1,500~~ 500 contracts if there is only one leg involved in the trade. If the Block Trade is executed as a spread transaction with multiple legs, each leg must meet the minimum Block Trade quantity for VA futures. A Block Trade may not be executed in VA futures as a strip.

The minimum price increment for a Block Trade in VA futures is 0.10 variance points.

Derived Block Trades, as set forth in Rule 415(s), may be entered into in VA futures. A Derived Block Trade in VA futures may be executed as a single leg transaction and not as a spread transaction.

(o) - (r) No changes.

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