

**Product Submission by ForecastEx LLC – Pursuant to 17 C.F.R. §§ 40.2**

January 1, 2025  
SUBMITTED VIA CFTC PORTAL  
Secretary of the Commission  
Office of the Secretariat  
U.S. Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, D.C. 20581

**Re: ForecastEx LLC – CFTC Regulation 40.2(a) Notification Regarding the Initial Listing of “Monthly Record Temperature Forecast Contract”**

Dear Mr. Kirkpatrick,

Pursuant to Section 5c(c) of the Commodity Exchange Act and Section 40.2(a) of the regulations of the Commodity Futures Trading Commission, ForecastEx LLC (“ForecastEx” or the “Exchange”) hereby notifies the Commission that it is self-certifying the “Monthly Record Temperature Forecast Contract”. ForecastEx will list a Forecast Contract corresponding to each monthly release of the Global Climate Report by the National Oceanic and Atmospheric Administration (“NOAA”).

The submission includes:

A concise explanation, analysis and background of the Contract;

- Certification;
- Appendix A with the Contract’s Terms and Conditions;
- Confidential Appendices with further information; and
- A request for FOIA confidential treatment.

The Exchange certifies that this submission (other than those appendices for which confidential treatment has been requested) has been concurrently posted on the Exchange’s website.

Any questions regarding this filing, as well as any notices pursuant to Commission Regulation 40.2, should be directed to the attention of the undersigned at [gdeese@forecastex.com](mailto:gdeese@forecastex.com) or 630-743-9013.

Respectfully submitted,

A handwritten signature in black ink that reads "Graham Deese". The signature is written in a cursive, flowing style.

Graham Deese  
ForecastEx Chief Regulatory Officer

Encl. (Appendix A)

cc: David Downey, ForecastEx Chief Executive Officer  
Andrew Naughton, ForecastEx Chief Financial Officer

**Attachments:**

Appendix A - Contract Terms and Conditions

Appendix B (Confidential) – Explanation and Analysis of the Product

Appendix C (Confidential) – Certification that Contracts are not Readily Susceptible to Manipulation

## Appendix A – Contract Terms and Conditions

**Event Question:** Will [month] [year] be the warmest [month] on record?

**Product Code:** MRT

**Instructions:** The Global Climate Report is published by the National Oceanic and Atmospheric Administration (“NOAA”) in the first half of the month at 10:00 am CT. Definitive release dates are determined no later than one week prior to a report's release and all public calendars will be updated accordingly. A schedule of releases are available: [here](#).

**Underlying:** NOAA publishes monthly rankings of temperature since 1850 (i.e. “Warmest December”). This contract resolves based on whether NOAA reports the reference month as the “1<sup>st</sup> Warmest,” month since 1850. The Underlying can be accessed: [here](#). Parameter should be set to “Average Temperature”, month and year should be set to the appropriate month and year, Region should be set to “Global,” and Surface set to “Land and Ocean.” After these settings are confirmed, select “Update”. The table below will show the temperature anomaly for the month as well as the rank of the month compared to previous months. From the top row of the table, labelled “1-month,” the underlying is shown in the “Rank” column as the “Warmest” ranking. If there are changes made to NOAA’s methodology that impact how the underlying is calculated, ForecastEx will use the data from the most recent up to date model to determine settlement. Links are provided for informational purposes only and the source agency may decide to publish the data at a different location at any time.

**Source Agency:** NOAA

**Minimum Tick:** The Minimum Tick size for the referred Contract shall be \$0.01.

**Listing Cycle:** ForecastEx will list monthly contracts for next three monthly releases of Average Global Temperatures, followed by the monthly releases corresponding with the final month of the next two quarters (i.e. March, June, September, and December).

**Thresholds:** For each contract expiration, one thresholds will be listed.

**Position Accountability:** The position accountability level is 250,000 Event Positions in any one Event Market.

**Last Trading Time:** 11:59:59 pm CT on the trading day preceding the Resolution Time.

**Payout Criteria:** The Settlement Value of each Monthly Record Temperature Contract is \$1.00 or \$0 depending on the Outcome of the Event Question. If the Outcome of the Event Question is “Yes”, then holders of the “Yes” Position will be entitled to receive the Settlement Value of \$1.00 per contract and holders of the “No” Position will receive \$0.00. If the Outcome of the Event Question is “No”, then holders of the “No” Position will be entitled to receive the Settlement Value of \$1.00 per contract and holders of the “Yes” Position will receive \$0.00.

**Resolution Time:** 10:00 am CT when NOAA publishes the Global Climate Report.

**Changes in Resolution Time:** The Resolution Time of a Contract is dependent on the time that NOAA releases Global Climate Report data. There are circumstances where ForecastEx may change the Resolution Time of a Contract.

1. **Delay by Source Agency:** In the event that the release of the Global Climate Report is delayed by NOAA, for instance in a government shutdown, ForecastEx will delay the Resolution Time of the Contract until such time as the NOAA releases the Global Climate Report for the reference month. In this case, ForecastEx would release a public notice to its website informing Market Participants that the Resolution of the Contract has been delayed and release a second notice to its website informing Market Participants when the contract ultimately resolves.
2. **Contracts with no currently scheduled release date:** NOAA generally publishes the release dates for the Global Climate Report up through the end of the current calendar year. ForecastEx will list multiple Monthly Record Temperature contracts that have Resolution dates beyond the currently published schedule of releases. For these contracts, ForecastEx will approximate the Resolution Time based on the anticipated release schedule from NOAA. Once NOAA has published the release schedule, ForecastEx will update the Resolution Times of the contract if necessary and publish a public notice to its website informing Market Participants of the revised Resolution Time.

**Expiration Time:** Same as Resolution time.

**Settlement Time:** Settlement for Resolved Monthly Record Temperature Contracts will occur after Resolution Time at 1:00 pm CT that same Business Day in accordance with ForecastEx Rule 603(b)(3)