



January 11, 2018

## BY ELECTRONIC SUBMISSION

Chris Kirkpatrick  
Office of the Secretariat  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, D.C. 20581

**Re: Volume Discount Program (Eris Exchange, LLC Submission #[20172018-01](#))**

Dear Mr. Kirkpatrick:

Eris Exchange, LLC (“Eris Exchange” or the “Exchange”) hereby submits for self-certification to the Commodity Futures Trading Commission (the “Commission”), under Commission regulation 40.6(a), an extension to the existing Volume Discount Program (“Program”) effective as of February 1, [20172018](#).

### Explanation and Analysis

The amended Exhibit A sets forth the terms of the Program, with deletions and additions indicated.

### Description of Rule Changes

Exchange Rule 517 permits the Exchange to establish fee incentive programs. No rule changes are required at this time.

### Core Principle Compliance

The Exchange’s staff has identified that the following designated contract market core principles (“Core Principles”) may be potentially impacted: Prevention of Market Disruption, Execution of Transactions, Protection of Market Participants, and Compliance with Rules, and Recordkeeping.

The Program’s incentive structure does not incentivize manipulative trading or market abuse and does not impact the Exchanges’ ability to perform its trade practice and market surveillance obligations under the Act. The Program’s incentives also do not impact order execution. The Exchanges’ market regulation staff will monitor trading under the Program to identify and prevent manipulative trading and market abuse.

Participants in the Program will be selected by the Exchanges’ staff using criteria as further stated in Exhibit A. The Program is subject to trading rules found in the Exchange’s Rulebook, at Chapter 4, that prohibit fraudulent, non-competitive, unfair or abusive practices. Certain trades or trading activity that do not comply with the Exchange’s Rulebook will be disqualified in the Chief Regulatory Officer’s sole discretion.

Furthermore, the Program will be subject to the Exchanges’ record retention policies which comply with the Commodity Exchange Act.

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**Public Information**

A notice and copy of this submission is posted on the Eris Exchange website at <http://www.erisfutures.com/cftc-submissions>.

**Opposing Views**

This submission was provided to the Regulatory Oversight Committee, the Exchange Practices Committee, and the Exchange Participant Committee. There were no opposing views to this Program.

**Certification**

Eris Exchange, LLC hereby certifies to the Commodity Futures Trading Commission, pursuant to the procedures set forth in Commission regulation §40.6, that this submission complies with the Commodity Exchange Act, as amended, and the regulations promulgated thereunder.

If you have any questions please feel free to contact me at the information below or David Karrow, Senior Counsel, at [david.karrow@erisfutures.com](mailto:david.karrow@erisfutures.com) or 312.626.2698.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Laurian Cristea", enclosed within a blue oval scribble.

Laurian Cristea  
Chief Regulatory Officer, and  
Head of Legal and Regulatory Affairs  
[laurian.cristea@erisfutures.com](mailto:laurian.cristea@erisfutures.com)  
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## EXHIBIT A

### Volume Discount Program

#### Program Purpose

The purpose of this Program is to incentivize traders who provide liquidity on Eris Exchange through increased volume. Increased liquidity in contracts traded on Eris Exchange benefits all participants in the market.

#### Product Scope

All Eris Standard Swap Futures Contracts available for trading on Eris Exchange ("Contracts").

#### Eligible Participants

Multiple participants may be accepted into the Program. Participants are required to have the operational capabilities and readiness to conduct transactions on Eris SwapBook™. Exchange staff will use a variety of factors in determining whether or not a prospective trader is selected to participate in the Program, including, but not limited to, previous experience in trading the Contracts and related interest rate products, and past performance in the Contracts. Participant eligibility shall be determined in the sole discretion of the Exchange.

#### Program Term

The end date will be January 31, ~~2018~~2019.

#### Hours

The incentives will apply to all trades made in the Contracts regardless of the execution time.

#### Program Incentives

For an initial term of six months, participants who achieve a volume threshold each month will receive discounted transaction fees for that month based on a sliding scale (up to \$0.20 reduction per transaction). Participation in the Program may be renewed for additional terms of up to six months each ending no later than January 31, ~~2018~~2019.

#### Monitoring and Termination of Status

The Exchange will monitor trading activity and eligible participants' performance and shall retain the right to revoke program eligibility and/or disqualify certain trades or trading activity not permitted under the Exchange Rulebook, in the Chief Regulatory Officer's sole discretion.

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EXHIBIT B

CONFIDENTIAL TREATMENT REQUESTED

