



January 16, 2017

**Via CFTC Portal**

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

**RE: trueEX LLC Product Certification (trueEX LLC submission #2017-01S.10)**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended, (the “Act”) and Commission Regulation 40.2(a), trueEX LLC (“trueEX” or the “Exchange”) hereby submits to the U.S. Commodity Futures Trading Commission (the “Commission”) this product certification as indicated below:

Product to be listed and related trueEX Rule:

Rule 1004

This new rule includes complete contract terms and conditions for Forward Rate Agreements (FRA) denominated in the following currencies:

- **Super-Major Currencies**
  - United States dollar (USD) – submission #2017-01S.1
  - European Union Euro Area euro (EUR) – submission #2017-01S.2
  - Japan yen (JPY) – submission #2017-01S.3
  - United Kingdom pound sterling (GBP) – submission #2017-01S.4
  
- **Major Currencies**
  - Australia dollar (AUD) – submission #2017-01S.5
  - Canada dollar (CAD) – submission #2017-01S.6
  - Denmark krone (DKK) – submission #2017-01S.7
  - Kingdom of Norway krone (NOK) – submission #2017-01S.8
  - Kingdom of Sweden krona (SEK) – submission #2017-01S.9
  - **New Zealand dollar (NZD) – submission #2017-01S.10**
  - Republic of South Africa rand (ZAR) – submission #2017-01S.11
  - Switzerland franc (CHF) – submission #2017-01S.12



### Non-Major Currencies

- Czech Koruna (CZK) – submission #2017-01S.13
- Hong Kong dollar (HKD) – submission #2017-01S.14
- Hungarian Forint (HUF) – submission #2017-01S.15
- Polish Zloty (PLN) – submission #2017-01S.16
- Singapore dollar (SGD) – submission #2017-01S.17

Pursuant to Commission Regulation 40.2, this submission includes:

- i. The Submission Cover Sheet
- ii. A copy of the Contract's rules (Rule 1004 of the trueEX Rulebook)
- iii. The intended listing date (January 18, 2017);

The aforementioned Rule 1004 in its entirety is attached as Exhibit 1 to this letter. Schedule 1001(c) which includes a tab for FRAs is included as Exhibit 2

A concise explanation and analysis of these additional Contracts, and their compliance with applicable provisions of the Commodity Exchange Act (the "Act"), including core principles, and the Commissions regulations thereunder, can be found in Exhibit 3.

trueEX certifies that this product certification and rule amendments comply with the Act and the Commission's regulations thereunder. There were no substantive opposing views expressed by the trueEX governing board or market participants to the addition of these Contract or the related rule amendments.

trueEX certifies that this certification has been concurrently posted on the Exchange's Web Site at <http://www.trueex.com/rules-and-notice>. This certification is intended to be effective on January 18, 2017.

If you have questions regarding this notice, please contact me at (312) 320-8934 or by email at [fran@trueex.com](mailto:fran@trueex.com).

Sincerely,

A handwritten signature in cursive script that reads "Fran Kenck".

Fran Kenck  
Chief Compliance Officer

## CHAPTER 10 INTEREST RATE SWAP CONTRACTS

### **RULE 1004. Forward Rate Agreement (“FRA”) Contracts**

(a) **Contract Description:** A forward rate agreement is a forward contract on a short-term interest rate, for which settlement is in the form of one payment at either the effective date or maturity date of the underlying forward contract period. The interest rate payment is exchanged at a future agreed upon date based on a notional amount, the number of days in the FRA calculation period, and the difference between a predetermined forward rate and the market rate on that date. This Rule 1004 contains general information about the Contract terms and conditions. Contracts eligible for trading on the Exchange can be found on the website at [www.trueex.com](http://www.trueex.com).

(b) **Trading Hours.**

SEF Trading Hours. The Trading Hours of the SEF Trading System that are applicable to the Contract described in this Rule 1004 will be as follows:

- The PTC Trading Hours will commence each Business Day at 8:00 a.m. London time (BST/GMT) and end each Business Day at 6:00 p.m. New York time (EST/EDT).

(c) **Currency.**

(i) **Super-Major Currencies**

- United States dollar (USD)
- European Union Euro Area euro (EUR)
- Japan yen (JPY)
- United Kingdom pound sterling (GBP)

(ii) **Major Currencies**

- Australian dollar (AUD)
- Canada dollar (CAD)
- Danish krone (DKK)
- Norwegian krone (NOK)
- New Zealand dollar (NZD)
- Swedish krona (SEK)
- Switzerland franc (CHF)
- South African rand (ZAR)

(iii) **Non-Major Currencies**

- Czech Republic koruna (CZK)
- Hong Kong dollar (HKD)

- Hungarian forint (HUF)
- Polish zloty (PLN)
- Singapore dollar (SGD)

(d) Trading Conventions.

Buyer (payer) of a FRA believes the rate at which the agreement is executed will be higher on the agreed upon start date. If the Traded rate is higher than the Benchmark rate, the payer will receive the interest differential from the seller (receiver).

(e) Swap Leg Convention

(i) Traded Rate. The agreed upon interest rate yield on Trade Date

(ii) Benchmark Rate. The rate associated with the Benchmark Index (dependent on Currency).

(iii) Payment frequency. One time coupon payment. The coupon period is the number of days between the Effective Date and Maturity Date of the FRA. The differential between the Traded Rate and the Benchmark rate will be exchanged between the buyer and seller on start date as per the trading conventions in (d) above.

(iv) Day Count Convention

- Bond Basis (30/360)
- Money Market Basis (ACT/360)
- ACT/365.FIXED
- ACT/ACT.ISDA
- 30E/360
- 30E/360.ISDA
- ACT/ACT.ICMA

(v) Holiday Calendar – Dependent on Currency

- US – New York (USNY)
- Europe – Target (EUTA)
- Great Britain – London (GBLO)
- Japan – Tokyo (JPTO)
  
- Australia – Sydney (AUSY)
- Canada – Toronto (CATO)
- Denmark – Copenhagen (DKCO)
- New Zealand – Wellington (NZWE)
- New Zealand – Auckland (NZAU)

- Norway – Oslo (NOOS)
- South Africa – Johannesburg (ZAJO)
- Sweden – Stockholm (SEST)
- Switzerland – Zurich (CHZU)
  
- Czech Republic – Prague (CZPR)
- Hong Kong – (HKHK)
- Hungary – Budapest (HUBU Singapore – (SGSI)
- Poland – Warsaw (PLWA)
- Singapore – Singapore (SGSI)

(vi) Business Day Convention. Modified Following with adjustment to FRA payment date. Business days in this convention must be valid business days in respect to Holiday Center associated with the Currency for payment date. If not, it will be the next day that is a business day. If the adjusted end dates fall at the end of the month, the day rolls to the preceding day. Preceding convention applies to the Floating Reset and Holiday Center associated with each index for the fixing date.

(vii) Benchmark Rate Index.

- USD-LIBOR-BBA
- EUR-EURIBOR-Reuters
- EUR-LIBOR-BBA
- GBP-LIBOR-BBA
- JPY-LIBOR-BBA
  
- AUD-BBR-BBSW
- CAD-BA-CDOR
- DKK-CIBOR2-DKNA13
- NZD-BBR-FRA
- NOK-NIBOR-NIBR
- ZAR-JIBAR-SAFEX
- SEK-STIBOR-SIDE
- CHF-LIBOR-BBA
  
- CZK-PRIBOR-PRBO
- HKD-HIBOR-HKAB
- HUG-BUBOR-Reuters
- PLN-WIBOR-WIBO
- SGD-SOR-VWAP
- SGD-SOR-Reuters

(f) Effective Date. The first date from which fixed and floating interest amounts are calculated. It is also referred to as the Start Date. The Effective Date of the FRA is

adjusted and must be a good business day. The Effective Date of a spot starting FRA is 0-2 days from trade date, depending on Currency.

(g) Maturity Date. The final date until which Fixed and Floating amounts are calculated. The Maturity Date may also be referred to as the Termination Date or End Date. The Maturity Date is adjusted and enables the calculation period to be known at the time of trade.

(h) Calculation Period Number of Days. The duration of time from the Effective Date to the Maturity Date. The Exchange will support duration greater than 3 days to 3.25 years, depending on Currency.

(i) Benchmark Reset Dates. The Benchmark Rate is set once during the term of the swap. The Benchmark Reset Date defaults to market standard per index.

(j) Payment Date. Unadjusted following the Holiday Centers and conventions defined in the FRA terms. Payment is either made on the Effective Date and discounted to settle the present value or at Maturity Date, with no discounting required.

(k) Discounting Method.

(i) ISDA. The payment is made on the effective date and discounted based on ISDA convention.

(ii) None. The payment is made on the maturity date

(l) Block Trades. A Block Trade in FRAs will be subject to the same minimum block sizes and rules for Fixed for Floating Interest Rate Swaps as indicated in Rule 1001(t).

(m) Clearing House. CME or LCH. Choice of Clearing House is determined at the time of order entry and is based on qualification of each Participant's/Customer's Clearing Firm.

Schedule 1001 (c) IRS Forward Rate Agreements ("FRAs") eligible for Portfolio Terminations and Compactions ("PTC") on The SEF Trading System.						Holiday Business Day Convention		CM			
Currency	Float Rate Index	Product Type	Spot Starting	Fixing Date Offset	Roll Types	Holiday Business Centers - Float Fixing Dates	Holiday Business Centers - Effective and Payment Dates	Max Tenor (yrs)	Valid Fixed Payment Frequencies	Valid Float Designated Maturities	Valid Float Payment Frequencies
AUD	AUD-BBR-BBSW	FRA	1	0	N/A	AUSY	AUSY	3	N/A	1M, 2M, 3M, 4M, 5M, 6M	N/A
CAD	CAD-BA-CDOR	FRA	0	0	N/A	CATO	CATO	3	N/A	1M, 2M, 3M, 6M, 12M	N/A
CHF	CHF-LIBOR-BBA	FRA	2	-2	N/A	GBLO	CHZU	2	N/A	1W, 1M, 2M, 3M, 6M, 12M	N/A
CZK	CZK-PRIBOR- PRBO	FRA	2	-2	N/A	CZPR	CZPR	2	N/A	1W, 2W, 1M, 2M, 3M, 6M, 9M, 12M	N/A

DKK	DKK-CIBOR2-DKNA13	FRA	2	-2	N/A	DKCO	DKCO	2	N/A	1W, 2W, 1M, 2M, 3M, 6M, 9M, 12M	N/A
EUR	EUR-EURIBOR-Reuters, EUR-LIBOR-BBA (LCH only)	FRA	2	-2	N/A	EUTA	EUTA	3	N/A	1W, 2W, 1M, 2M, 3M, 6M, 9M, 12M	N/A
GBP	GBP-LIBOR-BBA	FRA	0	0	N/A	GBLO	GBLO	3	N/A	1W, 1M, 2M, 3M, 6M, 12M	N/A
HKD	HKD-HIBOR-HKAB	FRA	0	0	N/A	HKHK	HKHK	2	N/A	1W, 2W, 1M, 2M, 3M, 6M, 12M	N/A
HUF	HUF-BUBOR-Reuters	FRA	2	-2	N/A	HUBU	HUBU	2	N/A	1W, 2W, 1M, 2M, 3M, 6M, 9M, 12M	N/A
JPY	JPY-LIBOR-BBA	FRA	2	-2	N/A	GBLO	JPTO,GBLO	3	N/A	1W, 1M, 2M, 3M, 6M, 12M	N/A



NOK	NOK-NIBOR-NIBR New Index (3.0): NOK-NIBOR-OIBOR	FRA	2	-2	N/A	NOOS	NOOS	2	N/A	1W, 1M, 2M, 3M, 6M	N/A
NZD	NZD-BBR-FRA	FRA	2	-2	N/A	NZWE, NZAU	NZWE, NZAU	2	N/A	1M, 2M, 3M, 4M, 5M, 6M	N/A
PLN	PLN-WIBOR-WIBO	FRA	2	-2	N/A	PLWA	PLWA	3	N/A	1W, 2W, 1M, 3M, 6M, 9M, 12M	N/A
SEK	SEK-STIBOR-SIDE	FRA	2	-2	N/A	SEST	SEST	3	N/A	1W, 1M, 2M, 3M, 6M	N/A
SGD	SGD-SOR-VWAP, (newer index) SGD-SOR-Reuters	FRA	2	-2	N/A	SGSI	SGSI	2	N/A	1M, 3M, 6M	N/A
USD	USD-LIBOR-BBA	FRA	2	-2	N/A	GBLO	USNY,GBLO	3	N/A	1W, 1M, 2M, 3M, 6M, 12M	N/A

ZAR	ZAR-JIBAR- SAFEX	FRA	0	0	N/A	ZAJO	ZAJO	3	N/A	1M, 3M, 6M, 9M, 12M	N/A
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ME				LCH							
Valid Float Reset Frequencies	Valid Stub Index Frequencies	Float Leg Day Count	Fixed Leg Day Count	Max Tenor (yrs)	Valid Fixed Payment Frequencies	Valid Float Designated Maturities	Valid Float Payment Frequencies	Valid Float Reset Frequencies	Valid Stub Index Frequencies	Float Leg Day Count	Fixed Leg Day Count
N/A	N/A	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
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N/A	N/A	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	N/A	N/A	1W, 2W, 1M, 2M, 3M, 6M, 9M, 12M	N/A	N/A	N/A	ACT/360	ACT/360

N/A	N/A	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	N/A	N/A	1W, 1M, 2M, 3M, 6M, 9M, 12M	N/A	N/A	N/A	ACT/360	ACT/360
N/A	N/A	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	N/A	N/A	EURIBOR: 1W, 2W, 1M, 2M, 3M, 6M, 9M, 12M LIBOR: 1W, 1M, 2M, 3M, 6M, 12M	N/A	N/A	N/A	ACT/360	ACT/360
N/A	N/A	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	N/A	N/A	1W, 1M, 2M 3M, 6M, 12M	N/A	N/A	N/A	ACT/365.FIXED	ACT/365.FIXED
N/A	N/A	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	N/A	N/A	1W, 2W, 1M, 2M, 3M, 6M, 9M, 12M	N/A	N/A	N/A	ACT/360	ACT/360
N/A	N/A	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	N/A	N/A	1W, 1M, 2M 3M, 6M, 1Y	N/A	N/A	N/A	ACT/360	ACT/360

N/A	N/A	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	N/A	N/A	1W, 1M, 2M, 3M, 6M	N/A	N/A	N/A	ACT/360	ACT/360
N/A	N/A	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	N/A	N/A	1W, 2W, 1M, 3M, 6M, 9M, 12M	N/A	N/A	N/A	ACT/365.FIXED	ACT/365.FIXED
N/A	N/A	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	N/A	N/A	1W, 1M, 2M 3M, 6M	N/A	N/A	N/A	ACT/360	ACT/360
N/A	N/A	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	N/A	N/A	1W, 1M, 2M 3M, 6M, 12M	N/A	N/A	N/A	ACT/360	ACT/360

N/A	N/A	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA ACT/ACT.ICMA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
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### **EXHIBIT 3**

The Contacts added under this submission are intended to be traded on the SEF Trading System.

The Exchange has determined that the following Core Principles apply to these Contracts:

#### SEF Core Principle 2 – Compliance with Rules

- Chapter 3 of the trueEX Rulebook provides for the impartial access by Participants to the trueEX platform. This is overseen by the Exchange Access Committee (Rule 207). Under Rule 207 the “The Exchange Access Committee shall not, and shall not permit the Exchange to, restrict access or impose burdens on access in a discriminatory manner, within each category or class of Participants or between similarly-situated categories or classes of Participants”. In addition, under Rule 301, any person, directly or indirectly, initiating or executing a transaction in the any Contracts traded on the Exchange consents to the jurisdiction of the Exchange.
- Abusive trading practices in any Contracts traded on the Exchange are prohibited by Chapter 5 of the Rulebook. The Rulebook is enforced by the Exchange Regulation Department. Chapter 6 of the Rulebook sets forth the rules governing both the investigations and prosecutions of Rule violations. Pursuant to Rule 208, the Regulatory Oversight Committee ensures that the Exchange Regulation Department has sufficient resources to perform its obligations.
- Rule 403 provides the Exchange with the ability and authority to obtain any information necessary to perform its obligations under Core Principle 2 and the Exchange has the authority to share information with other markets under information-sharing agreements.

#### SEF Core Principle 2 – Trade Information

- All required trade information is included in the audit trail and is sufficient for the Exchange Regulation Department to monitor for market abuse. Such information will be used to assist in the prevention of customer and market abuses and to provide evidence of any violations of the rules of the Exchange. All audit trail information is retained as required by CFTC Regulation 1.31.

#### SEF Core Principle 2 – Disciplinary Procedures

- Chapter 6 of the trueEX Rulebook sets forth the rules related to the investigation and prosecution of potential rule violations. Chapter 6 also sets forth potential sanctions for rule violations and is applicable to all Contracts traded on the Exchange.

#### SEF Core Principle 3 – Contracts Not Readily Subject to Manipulation

- trueEX has established rules and an enforcement infrastructure to prevent the manipulation of the Contract. The trueEX Rulebook is available at <http://www.trueex.com/rules-and-notice>. See Chapter 5: Trading Practices and Business Conduct; Chapter 6: Disciplinary



Rules. Exchange staff conduct real-time market surveillance, as well as T+1 surveillance and trade practice reviews.

#### SEF Core Principle 4 – Prevention of Market Distortion/SEF Core Principle 4 - Monitoring of Trading and Trade Processing

- Chapter 5 of the Rulebook prohibits Participants from manipulating, distorting the price of, and disrupting the settlement process of the any Contract traded on the Exchange. Rule 541 allows the Exchange to amend or cancel any trades as deemed necessary to prevent market distortion.

#### SEF Core Principle 7 – Financial Integrity of Transactions

- All Contracts shall be cleared by CME and LCH, which are registered derivatives clearing organization. Exchange Rules 404 and 407 ensure the financial integrity of futures commission merchants and introducing brokers as well as the protection of customer funds, to the extent that such entities and funds are associated with the trading of trueEX Contracts.

#### SEF Core Principle 9 – Daily/Timely Publication of Trading Information

- The Exchange shall publish on its website, [www.trueex.com](http://www.trueex.com), information required by Part 16 of the CFTC Regulations within the required time frame. trueEX typically posts this data on its website by 7:00 pm Eastern time on trade date. Under the new specs for Part 16 data published by the Commission, settlement prices are no longer required to be published by the SEF for swaps. Settlement prices will be provided by the applicable clearinghouse.