

SUBMISSION COVER SHEET

IMPORTANT: Check box if Confidential Treatment is requested

Registered Entity Identifier Code (optional): 20-057 (1 of 25)

Organization: Chicago Mercantile Exchange Inc. ("CME")

Filing as a: DCM SEF DCO SDR

Please note - only ONE choice allowed.

Filing Date (mm/dd/yy): 02/05/20 **Filing Description:** Initial Listing of Weekly Monday Options on British Pound/U.S. Dollar (GBP/USD) Futures, Canadian Dollar/U.S. Dollar (CAD/USD) Futures, Japanese Yen/U.S. Dollar (JPY/USD) Futures, Australian Dollar/U.S. Dollar (AUD/USD) Futures and Euro/U.S. Dollar (EUR/USD) Futures Contracts.

SPECIFY FILING TYPE

Please note only ONE choice allowed per Submission.

Organization Rules and Rule Amendments

- Certification § 40.6(a)
- Approval § 40.5(a)
- Notification § 40.6(d)
- Advance Notice of SIDCO Rule Change § 40.10(a)
- SIDCO Emergency Rule Change § 40.10(h)

Rule Numbers:

New Product

Please note only ONE product per Submission.

- Certification § 40.2(a)
- Certification Security Futures § 41.23(a)
- Certification Swap Class § 40.2(d)
- Approval § 40.3(a)
- Approval Security Futures § 41.23(b)
- Novel Derivative Product Notification § 40.12(a)
- Swap Submission § 39.5

Product Terms and Conditions (product related Rules and Rule Amendments)

- Certification § 40.6(a)
- Certification Made Available to Trade Determination § 40.6(a)
- Certification Security Futures § 41.24(a)
- Delisting (No Open Interest) § 40.6(a)
- Approval § 40.5(a)
- Approval Made Available to Trade Determination § 40.5(a)
- Approval Security Futures § 41.24(c)
- Approval Amendments to enumerated agricultural products § 40.4(a), § 40.5(a)
- "Non-Material Agricultural Rule Change" § 40.4(b)(5)
- Notification § 40.6(d)

Official Name(s) of Product(s) Affected:

Rule Numbers:

February 5, 2020

VIA ELECTRONIC PORTAL

Mr. Christopher J. Kirkpatrick
Office of the Secretariat
Commodity Futures Trading Commission
3 Lafayette Center
1155 21st Street NW
Washington, DC 20581

**Re: CFTC Regulation 40.2(a) Notification. Initial Listing of Weekly Monday Options on British Pound/U.S. Dollar (GBP/USD) Futures, Canadian Dollar/U.S. Dollar (CAD/USD) Futures, Japanese Yen/U.S. Dollar (JPY/USD) Futures, Australian Dollar/U.S. Dollar (AUD/USD) Futures and Euro/U.S. Dollar (EUR/USD) Futures Contracts.
CME Submission No. 20-057 (1 of 25)**

Dear Mr. Kirkpatrick:

Chicago Mercantile Exchange Inc. (“CME” or “Exchange”) hereby notifies the Commodity Futures Trading Commission (“CFTC” or “Commission”) that it is self-certifying the initial listing of Weekly Monday Options on British Pound/U.S. Dollar (GBP/USD) Futures, Canadian Dollar/U.S. Dollar (CAD/USD) Futures, Japanese Yen/U.S. Dollar (JPY/USD) Futures, Australian Dollar/U.S. Dollar (AUD/USD) Futures and Euro/U.S. Dollar (EUR/USD) Futures contracts (collectively, the “Contracts”) for trading via open outcry on the CME trading floor and on the CME Globex electronic trading system and for submission for clearing via CME ClearPort, effective on Sunday, February 23, 2020, for trade date Monday, February 24, 2020 as noted in the table below.

Contract Title	Rulebook Chapter	Commodity Code
Weekly Monday Options on British Pound/U.S. Dollar (GBP/USD) Futures – week 1 to week 5	251A	MB1-MB5
Weekly Monday Options on Canadian Dollar/U.S. Dollar (CAD/USD) Futures – week 1 to week 5	252A	MD1-MD5
Weekly Monday Options on Japanese Yen/U.S. Dollar (JPY/USD) Futures – week 1 to week 5	253A	MJ1-MJ5
Weekly Monday Options on Australian Dollar/U.S. Dollar (AUD/USD) Futures – week 1 to week 5	255A	MA1-MA5
Weekly Monday Options on Euro/U.S. Dollar (EUR/USD) Futures – week 1 to week 5	261A	MO1-MO5

The contract specifications of the Contracts generally mirror the specifications of the Exchange’s existing weekly Friday options. Weekly Monday options have Monday expiration maturities for premium-quoted (volatility-quoted options are not being listed) options whereas weekly Friday options have Friday expiration maturities. Similar to the Exchange’s weekly Friday options, the Contracts are European-style with a 10 a.m. ET (9 a.m. CT) fix. Four (4) consecutive weekly Monday options will be listed at all times.

The Exchange reviewed the designated contract market core principles (“Core Principles”) as set forth in the Commodity Exchange Act (“CEA” or “Act”) and identified that the listing of the Contracts may have some bearing on the following Core Principles:

- **Compliance with Rules:** Trading in the Contracts will be subject to CME Rulebook Chapter 4 which includes prohibitions against fraudulent, noncompetitive, unfair and abusive practices. Additionally, trading in these options contracts will also be subject to the full panoply of trade practice rules, the majority of which are contained in Chapter 5 and Chapter 8 of the CME Rulebook, and the dispute resolution and arbitration procedures of CME Rule Chapter 6. As with all products listed for trading on one of CME Group's designated contract markets, activity in the new products will be subject to extensive monitoring and surveillance by CME Group's Market Regulation Department. The Market Regulation Department has the authority to exercise its investigatory and enforcement power where potential rule violations are identified.
- **Contracts Not Readily Subject to Manipulation:** The Contracts are not readily subject to manipulation due to the deep liquidity and robustness in the underlying cash and futures market, which provides diverse participation and sufficient spot transactions.
- **Prevention of Market Disruption:** Trading in the Contracts will be subject to the Rules of CME which include prohibitions on manipulation, price distortion and disruptions of the delivery or cash-settlement process. As with all products listed for trading on one of CME Group's designated contract markets, activity in the new product will be subject to extensive monitoring and surveillance by CME Group's Market Regulation Department.
- **Position Limitations or Accountability:** The speculative position limits for the Contracts as demonstrated in this submission are consistent with the Commission's guidance.
- **Availability of General Information:** The Exchange will make publicly available the details of the Contracts' listing by publishing a Special Executive Report ("SER") to the market. The SER will be available on CME Group's website.
- **Daily Publication of Trading Information:** Trading volume, open interest, and price information will be published daily on the Exchange's website and via quote vendors.
- **Execution of Transactions:** The Contracts will be listed for trading on the CME trading floor and CME Globex and for clearing through CME ClearPort. The CME Globex electronic trading platform provides a transparent, open, and efficient mechanism to electronically execute trades.
- **Trade Information:** All required trade information is included in the audit trail and is sufficient for the Market Regulation Department to monitor for market abuse.
- **Financial Integrity of Contracts:** The Contracts will be cleared by the CME Clearing House, a derivatives clearing organization registered with the CFTC and subject to all CFTC regulations related thereto.
- **Protection of Market Participants:** CME Rulebook Chapters 4 and 5 set forth multiple prohibitions that preclude intermediaries from disadvantaging their customers. These rules apply to trading on all of the Exchange's competitive trading venues.
- **Disciplinary Procedures:** Chapter 4 of the CME Rulebook contains provisions that allow the Exchange to discipline, suspend or expel members or market participants that violate the CME Rulebook. Trading in the subject contracts will be subject to Chapter 4, and the Market Regulation Department has the authority to exercise its enforcement power in the event rule violations in this contract are identified.

- **Dispute Resolution:** Disputes with respect to trading in the Contracts will be subject to the arbitration provisions set forth in Chapter 6 of the CME Rulebook. Chapter 6 allows all nonmembers to submit a claim for financial losses resulting from transactions on the Exchange to arbitration. A member named as a respondent in a claim submitted by a nonmember is required to participate in the arbitration pursuant to Chapter 6. Additionally, the Exchange requires that members resolve all disputes concerning transactions on the Exchange via arbitration.

Pursuant to Section 5c(c) of the Act and CFTC Regulation 40.2(a), the Exchange certifies that the listing of the Contracts complies with the Act and rules thereunder. There were no substantive opposing views to this proposal.

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

Should you have any questions concerning the above, please contact the undersigned at (212) 299-2200 or via e-mail at CMEGSubmissionInquiry@cmegroup.com.

Sincerely,

/s/Christopher Bowen
Managing Director and Chief Regulatory Counsel

Attachments: Appendix A: CME Rulebook Chapters (blackline format)
Appendix B: Contract Specifications
Appendix C: CME Rulebook Chapter 5: Position Limit, Position Accountability and Reportability Level Table (attached under separate cover)
Appendix D: CME Rule 588.H. ("Globex Non-Reviewable Trading Ranges") Table (blackline format)
Appendix E: Exchange Fee Schedule
Appendix F: CME Rule 589. ("Special Price Fluctuation Limits and Daily Price Limits") Table (blackline format)
Appendix G: Cash Market Overview and Analysis of Deliverable Supply

Appendix A

CME Rulebook

(Additions are underlined.)

Chapter 251A

Options on British Pound Sterling/U.S. Dollar (GBP/USD) Futures

251A00. SCOPE OF CHAPTER

This chapter is limited in application to trading in put and call options on British pound (pound sterling) futures contracts. The procedures for trading, clearing, inspection, delivery and settlement and any other matters not specifically covered herein shall be governed by the rules of the Exchange.

For purposes of this chapter, unless otherwise specified, times referred to herein shall refer to and indicate Chicago time.

Options contracts covered by this chapter may also be referred to as:

GBP/USD Monthly Options

GBP/USD Weekly Monday Options

GBP/USD Weekly Wednesday Options

GBP/USD Weekly Friday Options

GBP/USD Monthly Volatility-Quoted Options

GBP/USD Weekly Wednesday Volatility-Quoted Options

GBP/USD Weekly Friday Volatility-Quoted Options

251A01. OPTION CHARACTERISTICS

251A01.J. Termination of Trading and Expiration Days for Options

5. Weekly Monday Options

Trading in weekly Monday options shall terminate at 9:00 a.m. Central time on Mondays. If the foregoing date for termination is a scheduled Exchange holiday, such weekly Monday option shall not be listed for trading. In the event that the underlying futures market does not open on the scheduled expiration day, the option expiration shall be extended to the next day on which the underlying futures market is open for trading.

Chapter 252A

Options on Canadian Dollar/U.S. Dollar (CAD/USD) Futures

252A00. SCOPE OF CHAPTER

This chapter is limited in application to options on Canadian dollar/U.S. dollar futures. In addition to this chapter, options on Canadian dollar/U.S. dollar futures shall be subject to the general rules and regulations of the Exchange insofar as applicable.

For purposes of this chapter, unless otherwise specified, times referred to herein shall refer to and indicate Chicago time.

Options contracts covered by this chapter may also be referred to as:

CAD/USD Monthly Options

CAD/USD Weekly Monday Options

CAD/USD Weekly Wednesday Options

CAD/USD Weekly Friday Options

CAD/USD Monthly Volatility-Quoted Options

CAD/USD Weekly Wednesday Volatility-Quoted Options

CAD/USD Weekly Friday Volatility-Quoted Options

252A01. OPTIONS CHARACTERISTICS

252A01.J. Termination of Trading and Expiration Days for Options

5. Weekly Monday Options

Trading in weekly Monday options shall terminate at 9:00 a.m. Central time on Mondays. If the foregoing date for termination is a scheduled Exchange holiday, such weekly Monday option shall not be listed for trading. In the event that the underlying futures market does not open on the scheduled expiration day, the option expiration shall be extended to the next day on which the underlying futures market is open for trading.

Chapter 253A Options on Japanese Yen/U.S. Dollar (JPY/USD) Futures

253A00. SCOPE OF CHAPTER

This chapter is limited in application to options on Japanese yen/U.S. dollar futures. In addition to this chapter, options on Japanese yen/U.S. dollar futures shall be subject to the general rules and regulations of the Exchange insofar as applicable.

For purposes of this chapter, unless otherwise specified, times referred to herein shall refer to and indicate Chicago time.

Options contracts covered by this chapter may also be referred to as:

JPY/USD Monthly Options

JPY/USD Weekly Monday Options

JPY/USD Weekly Wednesday Options

JPY/USD Weekly Friday Options

JPY/USD Monthly Volatility-Quoted Options

JPY/USD Weekly Wednesday Volatility-Quoted Options

JPY/USD Weekly Friday Volatility-Quoted Options

253A01. OPTIONS CHARACTERISTICS

253A01.J. Termination of Trading and Expiration Days for Options

5. Weekly Monday Options

Trading in weekly Monday options shall terminate at 9:00 a.m. Central time on Mondays. If the foregoing date for termination is a scheduled Exchange holiday, such weekly Monday option shall not be listed for trading. In the event that the underlying futures market does not open on the scheduled expiration day, the option expiration shall be extended to the next day on which the underlying futures market is open for trading.

Chapter 255A Options on Australian Dollar/U.S. Dollar (AUD/USD) Futures

255A00. SCOPE OF CHAPTER

This chapter is limited in application to options on Australian dollar/U.S. dollar futures. In addition to this chapter, options on Australian dollar/U.S. dollar futures shall be subject to the general rules and regulations of the Exchange insofar as applicable.

For purposes of this chapter, unless otherwise specified, times referred to herein shall refer to and indicate Chicago time.

For purposes of this chapter, unless otherwise specified, times referred to herein shall refer to and indicate Chicago time.

Options contracts covered by this chapter may also be referred to as:

AUD/USD Monthly Options

AUD/USD Weekly Monday Options

AUD/USD Weekly Wednesday Options

AUD/USD Weekly Friday Options

AUD/USD Monthly Volatility-Quoted Options

AUD/USD Weekly Wednesday Volatility-Quoted Options

AUD/USD Weekly Friday Volatility-Quoted Options

255A01. OPTIONS CHARACTERISTICS

255A01.J. Termination of Trading and Expiration Days for Options

5. Weekly Monday Options

Trading in weekly Monday options shall terminate at 9:00 a.m. Central time on Mondays. If the foregoing date for termination is a scheduled Exchange holiday, such weekly Monday option shall not be listed for trading. In the event that the underlying futures market does not open on the scheduled expiration day, the option expiration shall be extended to the next day on which the underlying futures market is open for trading.

Chapter 261A
Options on Euro/U.S. Dollar (EUR/USD) Futures

261A00. SCOPE OF CHAPTER

This chapter is limited in application to options on Euro/U.S. dollar futures. In addition to this chapter, options on Euro/U.S. dollar futures shall be subject to the general rules and regulations of the Exchange insofar as applicable.

For purposes of this chapter, unless otherwise specified, times referred to herein shall refer to and indicate Chicago time.

For purposes of this chapter, unless otherwise specified, times referred to herein shall refer to and indicate Chicago time.

Options contracts covered by this chapter may also be referred to as:

EUR/USD Monthly Options

EUR/USD Weekly Monday Options

EUR/USD Weekly Wednesday Options

EUR/USD Weekly Friday Options

EUR/USD Monthly Volatility-Quoted Options

EUR/USD Weekly Wednesday Volatility-Quoted Options

EUR/USD Weekly Friday Volatility-Quoted Options

261A01. OPTIONS CHARACTERISTICS

261A01.J. Termination of Trading and Expiration Days for Options

5. Weekly Monday Options

Trading in weekly Monday options shall terminate at 9:00 a.m. Central time on Mondays. If the foregoing date for termination is a scheduled Exchange holiday, such weekly Monday option shall not be listed for trading. In the event that the underlying futures market does not open on the scheduled expiration day, the option expiration shall be extended to the next day on which the underlying futures market is open for trading.

Appendix B
Contract Specifications

	Weekly Monday Options on Euro/U.S. Dollar (EUR/USD) Futures	Weekly Monday Options on Japanese Yen/U.S. Dollar (JPY/USD) Futures	Weekly Monday Options on British Pound/U.S. Dollar (GBP/USD) Futures	Weekly Monday Options on Australian Dollar/U.S. Dollar (AUD/USD) Futures	Weekly Monday Options on Canadian Dollar/U.S. Dollar (CAD/USD) Futures
Contract Unit	1 futures contract for 125,000 EUR	1 futures contract for 12,500,000 JPY	1 futures contract for 62,500 GBP	1 futures contract for 100,000 AUD	1 futures contract for 100,000 CAD
Minimum Price Fluctuation	0.0001 per euro increment = \$12.50 0.00005 per euro increment = \$6.25 for premium below 0.0005	0.000001 per Japanese yen increment = \$12.50 0.0000005 per Japanese yen increment = \$6.25 for premium below 0.000005	0.0001 per British pound increment = \$6.25	0.0001 per Australian dollar increment = \$10.00 0.00005 per Australian dollar increment = \$5.00 for premium below 0.0005	0.0001 per Canadian dollar increment = \$10.00 0.00005 per Canadian dollar increment = \$5.00 for premium below 0.0005
CME Globex and CME ClearPort Hours	Sunday - Friday 5:00 p.m. - 4:00 p.m. (6:00 p.m. - 5:00 p.m. ET) with a 60-minute break each day beginning at 4:00 p.m. (5:00 p.m. ET)				
Open Outcry Hours	Monday - Friday 7:20 a.m. – 2:00 p.m. (8:20 p.m. – 3:00 p.m. ET)				
Commodity Code	MO1-MO5	MJ1-MJ5	MB1-MB5	MA1-MA5	MD1-MD5
Listing Schedule	Weekly contracts listed for 4 consecutive weeks with Monday expirations				
First Listed Week	Week 1 March 2020				
Settlement Procedures	Physical-Exercise into Futures				
Termination of Trading	Monday of the contract week at 10:00 a.m. ET (9:00 a.m. CT)				
Exchange Rulebook Chapter	261A	253A	251A	255A	252A
Block Trade Minimum Threshold and Reporting Window	250 contracts Block trades in Foreign Exchange options products must be submitted within 15 minutes of execution.				
Exercise Style	European				
Settlement Method	Deliverable				
Underlying Futures Contract (CME ClearPort Code / CME Globex Code)	Euro/U.S. Dollar (EUR/USD) Futures (EC/6E)	Japanese Yen/U.S. Dollar (JPY/USD) Futures (J1/6J)	British Pound/U.S. Dollar (GBP/USD) Futures (BP/BP)	Australian Dollar/U.S. Dollar (AUD/USD) Futures (AD/6A)	Canadian Dollar/U.S. Dollar (CAD/USD) Futures (C1/6C)
CME Globex Matching Algorithm	FIFO				
Strike Increments	+/- 8 strikes at 0.0025 interval plus an additional +/-10 strikes at 0.0050 interval	+/- 8 strikes at 0.000025 interval plus an additional +/- 10 strikes at 0.000050 interval	+/- 10 strikes at 0.0050 interval plus an additional +/-5 strikes at 0.0100 interval	+/- 8 strikes at 0.0025 interval plus an additional +/-8 strikes at 0.0050 interval	+/- 8 strikes at 0.0025 interval plus an additional +/-8 strikes at 0.0050 interval

Appendix C

**CME Rulebook
Chapter 5
("Trading Qualifications and Practices")**

Position Limit, Position Accountability and Reportable Level Table
(under separate cover)

Appendix D
CME Rulebook
Chapter 5
(“Trading Qualifications and Practices”)

Instrument	Globex Symbol	Bid/Ask Reasonability	Non-Reviewable Range (NRR)
<u>AUD/USD</u> Weekly Monday Options	<u>MA1, MA2,</u> <u>MA3, MA4,</u> <u>MA5</u>	<u>The greater of the delta times the underlying futures' non-reviewable range or 5% of the fair value premium up to the underlying futures' non-reviewable range with a minimum reasonability of 10 ticks</u>	<u>The greater of delta times the underlying futures non-reviewable range or 20% of premium up to 1/4 of the underlying futures' non-reviewable range with a minimum of 1 tick</u>
<u>GBP/USD</u> Weekly Monday Options	<u>MB1, MB2,</u> <u>MB3, MB4,</u> <u>MB5</u>	<u>The greater of the delta times the underlying futures' non-reviewable range or 5% of the fair value premium up to the underlying futures' non-reviewable range with a minimum reasonability of 10 ticks</u>	<u>The greater of delta times the underlying futures non-reviewable range or 20% of premium up to 1/4 of the underlying futures' non-reviewable range with a minimum of 1 tick</u>
<u>CAD/USD</u> Weekly Monday Options	<u>MD1, MD2,</u> <u>MD3, MD4,</u> <u>MD5</u>	<u>The greater of the delta times the underlying futures' non-reviewable range or 5% of the fair value premium up to the underlying futures' non-reviewable range with a minimum reasonability of 10 ticks</u>	<u>The greater of delta times the underlying futures non-reviewable range or 20% of premium up to 1/4 of the underlying futures' non-reviewable range with a minimum of 1 tick</u>
<u>EUR/USD</u> Weekly Monday Options	<u>MO1, MO2,</u> <u>MO3, MO4,</u> <u>MO5</u>	<u>The greater of the delta times the underlying futures' non-reviewable range or 5% of the fair value premium up to the underlying futures' non-reviewable range with a minimum reasonability of 10 ticks</u>	<u>The greater of delta times the underlying futures non-reviewable range or 20% of premium up to 1/4 of the underlying futures' non-reviewable range with a minimum of 1 tick</u>
<u>JPY/USD Weekly</u> <u>Monday Options</u>	<u>MJ1, MJ2,</u> <u>MJ3, MJ4,</u> <u>MJ5</u>	<u>The greater of the delta times the underlying futures' non-reviewable range or 5% of the fair value premium up to the underlying futures' non-reviewable range with a minimum reasonability of 10 ticks</u>	<u>The greater of delta times the underlying futures non-reviewable range or 20% of premium up to 1/4 of the underlying futures' non-reviewable range with a minimum of 1 tick</u>

CME Rule 588.H. (“Globex Non-Reviewable Trading Ranges”) Table
(Additions are underlined.)

Appendix E Exchange Fee Schedule

Membership Type	Venue/Transaction Type	Fee
Individual Members Clearing Equity Member Firms Rule 106.J Equity Member Firms & Rule 106.J Qualified Subsidiaries Rule 106.I Member Firms & Rule 106.I Qualified Affiliates Rule 106.S Member Approved Funds	Open Outcry Delivery	\$0.07
	CME Globex	\$0.32
	EFPIEFR	\$0.65
	Block	\$1.07
	Exercise Assign Future From	\$0.12
Rule 106.D Lessees Rule 106.F Employees	Open Outcry Delivery	\$0.27
	CME Globex	\$0.52
	EFPIEFR	\$0.68
	Block	\$1.27
	Exercise Assign Future From	\$0.32
Rule 106.R Electronic Corporate Members <i>(For other than CME Globex - See Non-Members)</i>	CME Globex	\$0.44
Rule 106.H and 106.N Firms Clearing Non-Equity Member Firms	Open Outcry Delivery	\$0.45
	CME Globex	\$0.44
	EFPIEFR	\$0.70
	Block	\$1.45
	Exercise Assign Future From	\$0.50
International Incentive Program (IIP) Participants International Volume Incentive Program (IVIP) Participants <i>(For other than CME Globex - See Non-Members)</i>	Open Outcry/Delivery	\$0.54
	CME Globex	\$0.54
Central Bank Incentive Program (CBIP) Participants Emerging Markets Bank Incentive Program (EMBIP) Participants Latin American Fund Manager Incentive Program (FMIP) Participants <i>(For other than CME Globex)</i>	CME Globex	\$1.00
CTA/Hedge Fund Incentive Program Participants <i>(For other than CME Globex - See Non-Members)</i>	CME Globex	Refer to Volume Discount Notes
Members Trading Outside of Division <i>(For other than CME Globex)</i>	CME Globex – During ETH only	\$0.85
Non-Members <i>(Including: CBOE Members)</i>	Open Outcry Delivery	\$0.60
	CME Globex	\$1.60
	EFPIEFR Block	\$1.60
	Exercise Assign Future From	\$0.65

106.D Lessee/106.H Brokerage	\$0.13
106.F Employee Brokerage	\$0.13
Floor / "New" Brokerage	\$0.04
Position Adjustments/Position Transfers	\$0.10
Give-Up Surcharge	\$0.05*
Facilitation Fee	\$0.40

*Currently waived for all FX options through January 31, 2021

Appendix F

**CME Rulebook
Chapter 5
("Trading Qualifications and Practices")**

CME Rule 589. ("Special Price Fluctuation Limits and Daily Limits") Table
(Additions are underlined.)

Product	Rulebook Chapter	Commodity Code	Primary/Associated	Associated With	Base in Real Economic Value	Level 1	Level 2	Level 3	Level 4	Level 5
<u>AUD/USD Weekly Monday Options</u>	<u>255A</u>	<u>MA1, MA2, MA3, MA4, MA5</u>	<u>Associated</u>	<u>6A</u>	<u>N/A</u>					<u>No Limit</u>
<u>GBP/USD Weekly Monday Options</u>	<u>251A</u>	<u>MB1, MB2, MB3, MB4, MB5</u>	<u>Associated</u>	<u>6B</u>	<u>N/A</u>					<u>No Limit</u>
<u>CAD/USD Weekly Monday Options</u>	<u>252A</u>	<u>MD1, MD2, MD3, MD4, MD5</u>	<u>Associated</u>	<u>6C</u>	<u>N/A</u>					<u>No Limit</u>
<u>EUR/USD Weekly Monday Options</u>	<u>261A</u>	<u>MO1, MO2, MO3, MO4, MO5</u>	<u>Associated</u>	<u>6E</u>	<u>N/A</u>					<u>No Limit</u>
<u>JPY/USD Weekly Monday Options</u>	<u>253A</u>	<u>MJ1, MJ2, MJ3, MJ4, MJ5</u>	<u>Associated</u>	<u>6J</u>	<u>N/A</u>					<u>No Limit</u>

Appendix G

Cash Market Overview and Analysis of Deliverable Supply

As a basis for providing a uniform and methodical analysis of the position limits, the Exchange adopted the following metrics to frame its analysis quantitatively.

The Exchange defines the deliverable grade as equal to the M1 money supply. In general terms, M1 money supply consists of currency in circulation plus demand deposits, such as checking and savings accounts. M1 is the narrowest and most conservative definition of the deliverable currency stock available on a spot market basis. M1 data is also readily available.¹

First, the Exchange recommends a single month position accountability equal to one or two percent of M1 money supply. The Exchange believes one or two percent is a conservative level as it is substantially below the CFTC's 25 percent maximum threshold.

Second, the Exchange recommends all months position limits equal to two percent of M1 money supply. The Exchange believes two percent is a conservative level as is consistent with the Commission's guidance.

Weekly Monday Options

- ***Currency Background***

According to the 2019 Triennial Central Bank Survey conducted by the Bank for International Settlements, the Contracts are the top five most traded currencies in the world.² BIS data show that the Contracts had a daily average volume of \$332 to \$2,129 billion.³ The Contracts are part of the CLS Group's global cash settlement system.

- ***Cash Market Analysis***

Exhibit 1 summarizes M1 money supply on a monthly basis between January 2017 and October 2019. During this three-year period, M1 increased by 11 to 32 percent.

- ***Spot Month Contract Position Limit***

The Contracts will not have a spot month position limit like Wednesday and Friday Weekly, Serial and Quarterly expirations.

- ***Single Month Contract Position Accountability***

The Contracts will have a single month contract position accountability level of 10,000 (EUR/USD, JPY/USD and GBP/USD) or 6,000 (CAD/USD, AUD/USD) contracts. The 10,000 and 6,000 contract single month position accountability is equal to 0.02% to 0.18% of M1. The Exchange believes this is a conservative level and is consistent with the Commission's guidance.

¹ See <https://fred.stlouisfed.org/search?et=&nasw=0&pageID=4&st=M1+Money+Stock&t=m1>

² See *Triennial Central Bank Survey*, Bank for International Settlements, September 2019, table D11.3, https://www.bis.org/statistics/d11_3.pdf

³ Ibid.

• **All Months Contract Position Accountability**

The Contracts will have a 10,000 (EUR/USD, JPY/USD and GBP/USD) or 6,000 (CAD/USD, AUD/USD) contract single month position accountability. The 10,000 and 6,000 contract single month position accountability is equal to 0.02% to 0.18% of M1. The Exchange believes this is a conservative level and is consistent with the Commission's guidance.

• **Aggregation of Position Limits**

Options positions are netted against the spot month position limit and the single and all month position accountability levels of the corresponding futures contract.

Exhibit 1: Weekly Monday Options Position Limit Analysis

	M1 for the Euro Area			M1 for Japan			M1 for the UK			M1 for Canada			M1 for Australia		
	Single Month	All Months		Single Month	All Months		Single Month	All Months	Single Month	All Months		Single Month	All Months	Single Month	All Months
January 2017	7,183,654,000,000	0.02%	0.02%	691,050,600,000,000	0.18%	0.18%	1,615,767,000,000	0.04%	0.04%	907,100,000,000	0.07%	0.07%	793,200,000,000	0.08%	0.08%
February 2017	7,218,433,000,000	0.02%	0.02%	695,616,400,000,000	0.18%	0.18%	1,628,241,000,000	0.04%	0.04%	905,496,000,000	0.07%	0.07%	800,200,000,000	0.07%	0.07%
March 2017	7,309,106,000,000	0.02%	0.02%	698,512,900,000,000	0.18%	0.18%	1,648,075,000,000	0.04%	0.04%	914,546,000,000	0.07%	0.07%	806,200,000,000	0.07%	0.07%
April 2017	7,406,432,000,000	0.02%	0.02%	701,805,200,000,000	0.18%	0.18%	1,659,847,000,000	0.04%	0.04%	925,897,000,000	0.06%	0.06%	815,600,000,000	0.07%	0.07%
May 2017	7,436,957,000,000	0.02%	0.02%	705,576,200,000,000	0.18%	0.18%	1,662,820,000,000	0.04%	0.04%	936,475,000,000	0.06%	0.06%	823,600,000,000	0.07%	0.07%
June 2017	7,515,757,000,000	0.02%	0.02%	708,836,400,000,000	0.18%	0.18%	1,668,261,000,000	0.04%	0.04%	941,513,000,000	0.06%	0.06%	827,000,000,000	0.07%	0.07%
July 2017	7,544,127,000,000	0.02%	0.02%	713,064,200,000,000	0.18%	0.18%	1,665,898,000,000	0.04%	0.04%	945,629,000,000	0.06%	0.06%	828,100,000,000	0.07%	0.07%
August 2017	7,571,611,000,000	0.02%	0.02%	716,721,400,000,000	0.17%	0.17%	1,685,078,000,000	0.04%	0.04%	947,615,000,000	0.06%	0.06%	830,200,000,000	0.07%	0.07%
September 2017	7,620,421,000,000	0.02%	0.02%	721,731,100,000,000	0.17%	0.17%	1,690,690,000,000	0.04%	0.04%	949,130,000,000	0.06%	0.06%	832,300,000,000	0.07%	0.07%
October 2017	7,646,118,000,000	0.02%	0.02%	725,998,700,000,000	0.17%	0.17%	1,689,489,000,000	0.04%	0.04%	954,923,000,000	0.06%	0.06%	837,800,000,000	0.07%	0.07%
November 2017	7,723,960,000,000	0.02%	0.02%	730,486,400,000,000	0.17%	0.17%	1,695,611,000,000	0.04%	0.04%	956,867,000,000	0.06%	0.06%	847,800,000,000	0.07%	0.07%
December 2017	7,786,276,000,000	0.02%	0.02%	733,049,800,000,000	0.17%	0.17%	1,702,338,000,000	0.04%	0.04%	964,034,000,000	0.06%	0.06%	851,100,000,000	0.07%	0.07%
January 2018	7,767,199,000,000	0.02%	0.02%	737,145,100,000,000	0.17%	0.17%	1,711,026,000,000	0.04%	0.04%	961,971,000,000	0.06%	0.06%	858,000,000,000	0.07%	0.07%
February 2018	7,777,076,000,000	0.02%	0.02%	739,811,800,000,000	0.17%	0.17%	1,712,170,000,000	0.04%	0.04%	967,127,000,000	0.06%	0.06%	863,900,000,000	0.07%	0.07%
March 2018	7,840,112,000,000	0.02%	0.02%	742,433,000,000,000	0.17%	0.17%	1,699,721,000,000	0.04%	0.04%	972,762,000,000	0.06%	0.06%	871,000,000,000	0.07%	0.07%
April 2018	7,892,094,000,000	0.02%	0.02%	745,898,000,000,000	0.17%	0.17%	1,712,340,000,000	0.04%	0.04%	975,102,000,000	0.06%	0.06%	872,600,000,000	0.07%	0.07%
May 2018	7,994,826,000,000	0.02%	0.02%	749,410,300,000,000	0.17%	0.17%	1,735,618,000,000	0.04%	0.04%	971,950,000,000	0.06%	0.06%	878,300,000,000	0.07%	0.07%
June 2018	8,086,677,000,000	0.02%	0.02%	754,797,200,000,000	0.17%	0.17%	1,740,511,000,000	0.04%	0.04%	978,808,000,000	0.06%	0.06%	873,100,000,000	0.07%	0.07%
July 2018	8,080,650,000,000	0.02%	0.02%	758,009,100,000,000	0.16%	0.16%	1,740,771,000,000	0.04%	0.04%	981,127,000,000	0.06%	0.06%	864,400,000,000	0.07%	0.07%
August 2018	8,082,134,000,000	0.02%	0.02%	761,613,600,000,000	0.16%	0.16%	1,745,854,000,000	0.04%	0.04%	987,756,000,000	0.06%	0.06%	870,000,000,000	0.07%	0.07%
September 2018	8,152,503,000,000	0.02%	0.02%	766,024,500,000,000	0.16%	0.16%	1,752,545,000,000	0.04%	0.04%	992,400,000,000	0.06%	0.06%	867,500,000,000	0.07%	0.07%
October 2018	8,163,988,000,000	0.02%	0.02%	768,160,000,000,000	0.16%	0.16%	1,777,998,000,000	0.04%	0.04%	994,781,000,000	0.06%	0.06%	867,500,000,000	0.07%	0.07%
November 2018	8,260,665,000,000	0.02%	0.02%	770,794,800,000,000	0.16%	0.16%	1,770,857,000,000	0.04%	0.04%	1,001,866,000,000	0.06%	0.06%	867,300,000,000	0.07%	0.07%
December 2018	8,307,132,000,000	0.02%	0.02%	772,991,700,000,000	0.16%	0.16%	1,768,486,000,000	0.04%	0.04%	1,008,046,000,000	0.06%	0.06%	871,100,000,000	0.07%	0.07%
January 2019	8,264,085,000,000	0.02%	0.02%	775,514,100,000,000	0.16%	0.16%	1,763,315,000,000	0.04%	0.04%	1,002,966,000,000	0.06%	0.06%	875,600,000,000	0.07%	0.07%
February 2019	8,305,126,000,000	0.02%	0.02%	779,722,100,000,000	0.16%	0.16%	1,760,048,000,000	0.04%	0.04%	1,003,370,000,000	0.06%	0.06%	881,500,000,000	0.07%	0.07%
March 2019	8,442,880,000,000	0.01%	0.01%	783,511,400,000,000	0.16%	0.16%	1,757,135,000,000	0.04%	0.04%	1,007,653,000,000	0.06%	0.06%	890,300,000,000	0.07%	0.07%
April 2019	8,488,871,000,000	0.01%	0.01%	788,810,600,000,000	0.16%	0.16%	1,765,658,000,000	0.04%	0.04%	1,014,951,000,000	0.06%	0.06%	902,100,000,000	0.07%	0.07%
May 2019	8,576,202,000,000	0.01%	0.01%	794,350,200,000,000	0.16%	0.16%	1,769,515,000,000	0.04%	0.04%	1,021,866,000,000	0.06%	0.06%	904,000,000,000	0.07%	0.07%
June 2019	8,670,227,000,000	0.01%	0.01%	793,165,400,000,000	0.16%	0.16%	1,769,685,000,000	0.04%	0.04%	1,026,433,000,000	0.06%	0.06%	912,800,000,000	0.07%	0.07%
July 2019	8,698,937,000,000	0.01%	0.01%	794,945,600,000,000	0.16%	0.16%	1,782,292,000,000	0.04%	0.04%	1,039,508,000,000	0.06%	0.06%	1,017,200,000,000	0.06%	0.06%
August 2019	8,787,758,000,000	0.01%	0.01%	800,002,400,000,000	0.16%	0.16%	1,792,878,000,000	0.03%	0.03%				1,023,900,000,000	0.06%	0.06%
September 2019	8,789,295,000,000	0.01%	0.01%	804,871,700,000,000	0.16%	0.16%	1,792,997,000,000	0.03%	0.03%				1,034,400,000,000	0.06%	0.06%
October 2019	8,848,832,000,000	0.01%	0.01%	807,415,700,000,000	0.15%	0.15%	1,793,196,000,000	0.03%	0.03%				1,051,200,000,000	0.06%	0.06%
Maximum:	8,848,832,000,000	0.02%	0.02%	807,415,700,000,000	0.18%	0.18%	1,793,196,000,000	0.04%	0.04%	1,039,508,000,000	0.07%	0.07%	1,051,200,000,000	0.08%	0.08%
75 Percentile:	8,306,630,500,000	0.02%	0.02%	778,670,100,000,000	0.17%	0.17%	1,767,779,000,000	0.04%	0.04%	1,002,416,000,000	0.06%	0.06%	880,700,000,000	0.07%	0.07%
Median:	8,037,738,000,000	0.02%	0.02%	752,103,750,000,000	0.17%	0.17%	1,738,064,500,000	0.04%	0.04%	972,762,000,000	0.06%	0.06%	867,500,000,000	0.07%	0.07%
25 Percentile:	7,626,845,250,000	0.02%	0.02%	722,798,000,000,000	0.16%	0.16%	1,689,789,250,000	0.04%	0.04%	948,372,500,000	0.06%	0.06%	833,675,000,000	0.07%	0.07%
Minimum:	7,183,654,000,000	0.01%	0.01%	691,050,600,000,000	0.15%	0.15%	1,615,767,000,000	0.03%	0.03%	905,496,000,000	0.06%	0.06%	793,200,000,000	0.06%	0.06%
3 Year Growth Rate:	23.2%			16.8%			11.0%			14.6%			32.5%		