

March 8, 2019

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

Re: <u>Cboe Futures Exchange, LLC Rule Certification</u>

Submission Number CFE-2019-004

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended ("Act"), and §40.6(a) of the regulations 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 change the closing time for trading in Cboe® iBoxx® iShares® Bond Index ("CB Index") futures. Exhibit 1 to this submission sets forth the rule changes included in the Amendment. The Amendment will become effective on or after March 22, 2019, on a date to be announced by the Exchange through the issuance of an Exchange notice.

Chapter 15 of the CFE Rulebook includes contract specification provisions relating to CB Index futures. CFE currently offers two CB Index futures for trading: Cboe® iBoxx® iShares® \$ High Yield Corporate Bond Index Futures ("IBHY futures") and Cboe® iBoxx® iShares® \$ Investment Grade Corporate Bond Index ("IBIG futures").¹ CFE Rule 1502(b) (Schedule and Prohibited Order Types) sets forth the trading hours for CB Index futures. The trading hours for CB Index futures are currently from 8:30 a.m. to 3:15 p.m., except that the trading hours for an expiring CB Index future end at 2:00 p.m. on its final settlement date.²

CFE is amending Rule 1502(b) to change the time of the close of trading hours for non-expiring CB Index futures from 3:15 p.m. to 3:00 p.m. so that the trading hours for non-expiring CB Index futures will run from 8:30 a.m. to 3:00 p.m. The time of the close of trading hours for an expiring CB Index future on its final settlement date will remain at 2:00 p.m.

The components of the corporate bond index that underlies each CB Index future are derived from the intersection of the components of a benchmark corporate bond index and the portfolio of an exchange-traded fund ("ETF") that holds corporate bonds. CFE understands that market participants

¹ See Exhibit 2 for disclaimers and trademarks with respect to IBHY and IBIG futures relating to and of Markit Indices Limited and BlackRock Fund Advisors.

² All times referenced in this submission are Chicago time.

in CB Index futures, including lead market makers in CB Index futures under the Lead Market Maker Program that CFE has in place for CB Index futures, may utilize these ETFs for hedging purposes in connection with their trading of CB Index futures. The regular trading hours for these ETFs end at 3:00 p.m. making it more difficult to hedge when trading in CB Index futures after 3:00 p.m. and thus potentially impacting market quality in CB Index futures after 3:00 p.m.

CFE believes that the Amendment is consistent with Designated Contract Market Core Principle 9 (Execution of Transactions) under Section 5 of the Act in that CFE believes that aligning the trading hours of CB Index futures with the trading hours of related ETFs will contribute to a competitive, open, and efficient market for executing transactions in CB Index futures in CFE's centralized market.

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 Web site (http://cfe.cboe.com/aboutcfe/rules.aspx) 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 Nicole Gordon at (312) 786-8109. Please reference our submission number CFE-2019-004 in any related correspondence.

Cboe Futures Exchange, LLC

/s/ Matthew McFarland

By: Matthew McFarland Managing Director

EXHIBIT 1

The Amendment, marked to show additions in <u>underlined</u> text and deletions in [bracketed] text, consists of the following:

* * * * *

Cboe Futures Exchange, LLC Rulebook

1502. Contract Specifications

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- (a) No change.
- (b) Schedule and Prohibited Order Types. The Exchange may list for trading up to four near-term serial months and four months on the March quarterly cycle for each CB Index futures product. The final settlement date for an CB Index future is the first business day of the calendar month denoted by the ticker symbol for the Contract. If the final settlement date is a CFE holiday, the final settlement date shall be the business day immediately following the holiday.

The trading days for CB Index futures are any Business Day the Exchange is open for trading.

The trading hours for CB Index futures are from 8:30 a.m. to [3:15 p.m.] 3:00 p.m. Chicago time, except that the trading hours for an expiring CB Index future end at 2:00 p.m. Chicago time on its final settlement date. Non-expiring CB Index futures continue to trade until [3:15 p.m.] 3:00 p.m. Chicago time on that date.

Market Orders for CB Index futures will not be accepted by the Exchange for CB Index futures. Any Market Orders for CB Index futures received by the Exchange will be automatically rejected or canceled back to the sender.

(c) - (r) No change.

EXHIBIT 2

The iBoxx® iShares® \$ High Yield Corporate Bond Index and the iBoxx® iShares® \$ Investment Grade Corporate Bond Index (the "Indexes") referenced herein are the property of Markit Indices Limited ("Index Sponsor") and have been licensed for use in connection with Cboe® iBoxx® iShares® \$ High Yield Corporate Bond Index Futures and Cboe® iBoxx® iShares® \$ Investment Grade Corporate Bond Index Futures. Each party to a Cboe[®] iBoxx[®] iShares[®] \$ High Yield Corporate Bond Index Futures or Cboe® iBoxx® iShares® \$ Investment Grade Corporate Bond Index Futures transaction acknowledges and agrees that the transaction is not sponsored, endorsed or promoted by the Index Sponsor. The Index Sponsor makes no representation whatsoever, whether express or implied, and hereby expressly disclaims all warranties (including, without limitation, those of merchantability or fitness for a particular purpose or use), with respect to the Indexes or any data included therein or relating thereto, and in particular disclaims any warranty either as to the quality, accuracy and/or completeness of the Indexes or any data included therein, the results obtained from the use of the Indexes and/or the composition of the Indexes at any particular time on any particular date or otherwise and/or the creditworthiness of any entity, or the likelihood of the occurrence of a credit event or similar event (however defined) with respect to an obligation, in the Indexes at any particular time on any particular date or otherwise. The Index Sponsor shall not be liable (whether in negligence or otherwise) to the parties or any other person for any error in the Indexes, and the Index Sponsor is under no obligation to advise the parties or any person of any error therein.

The Index Sponsor makes no representation whatsoever, whether express or implied, as to the advisability of purchasing or selling Cboe® iBoxx® iShares® \$ High Yield Corporate Bond Index Futures or Cboe® iBoxx® iShares® \$ Investment Grade Corporate Bond Index Futures, the ability of the Indexes to track relevant markets' performances, or otherwise relating to the Indexes or any transaction or product with respect thereto, or of assuming any risks in connection therewith. The Index Sponsor has no obligation to take the needs of any party into consideration in determining, composing or calculating the Indexes. No party purchasing or selling Cboe® iBoxx® iShares® \$ High Yield Corporate Bond Index Futures or Cboe® iBoxx® iShares® \$ Investment Grade Corporate Bond Index Futures, nor the Index Sponsor, shall have any liability to any party for any act or failure to act by the Index Sponsor in connection with the determination, adjustment, calculation or maintenance of the Indexes.

iBoxx® is a service mark of IHS Markit Limited.

The iBoxx® iShares® \$ High Yield Corporate Bond Index and the iBoxx® iShares® \$ Investment Grade Corporate Bond Index (the "Indexes") and futures contracts on the Indexes ("Contracts") are not sponsored by, or sold by BlackRock, Inc. or any of its affiliates (collectively, "BlackRock"). BlackRock makes no representation or warranty, express or implied to any person regarding the advisability of investing in securities, generally, or in the Contracts in particular. Nor does BlackRock make any representation or warranty as to the ability of the Indexes to track the performance of the fixed income securities market, generally, or the performance of HYG, LQD or any subset of fixed income securities.

BlackRock has not calculated, composed or determined the constituents or weightings of the fixed income securities that comprise the Indexes ("Underlying Data"). BlackRock is not responsible for and has not participated in the determination of the prices and amounts of the Contracts, or the timing of the issuance or sale of such Contracts or in the determination or calculation of the equation by which the Contracts are to be converted into cash (if applicable). BlackRock has no obligation or liability in connection with the administration or trading of the Contracts. BlackRock does not guarantee the accuracy or the completeness of the Underlying Data and any data included therein and BlackRock shall

have no liability for any errors, omissions or interruptions related thereto.

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iShares® is a registered trade mark of BlackRock Fund Advisors and its affiliates.