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April 8, 2019

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

Re: OneChicago, LLC Security Futures Product Rule Submission
       Amending Position Limits for Certain Security Futures Products
       (OneChicago Submission Number 19-008)

Dear Mr. Kirkpatrick:

Pursuant to section 5c(c)(1) of the Commodity Exchange Act, as amended (the "Act"), and §
41.24(a) of the regulations promulgated by the Commodity Futures Trading Commission ("CFTC"
or the "Commission") under the Act, OneChicago, LLC ("OneChicago" or the "Exchange")
hereby submits the following security futures product rule amendment, which will become
effective on April 23, 2019.

Section 41.25(a)(3) of the Commission's regulations establishes speculative position limits for
security futures products. Pursuant to that section, designated contract markets ("DCMs") must
adopt position limits of 13,500 contracts for security futures products, but may adopt increased
position limits (or Position Accountability) when the underlying security meets certain criteria.
Those criteria are related to the average daily trading volume and the number of shares outstanding
for the underlying security. OneChicago has recalculated the position limits for its security futures
products based on these criteria, and is amending position limits for the following products:

Underlying Symbol	Name	Previous Position Limit	New Position Limit
BBD	Banco Bradesco S.A.	13,500	22,500
FOX	Fox Corporation	13,500	PA
FOXA	Fox Corporation	13,500	PA
GG	Goldcorp, Inc.	13,500	22,500
NBR	Nabors Industrials Ltd.	22,500	13,500
KO	The Coca-Cola Company	13,500	22,500

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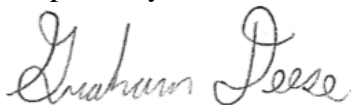| Underlying Symbol	Name	Previous Position Limit	New Position Limit
RIG	Transocean Ltd.	22,500	13,500
SWN	Southwestern Energy Company	PA	22,500
XLU	Utilities Select Sector SPDR Fund	22,500	PA

*   *   *

The purpose and effect of the rule amendment is to set position limits for OneChicago products in accordance with § 41.25 of the Commission's regulations. Comments on this security futures rule amendment have not been solicited and none have been received. OneChicago is not aware of any substantive opposing views to this rule amendment. OneChicago certifies that the rule amendment complies with the Act, including the core principles, and the Commission's regulations promulgated thereunder. OneChicago further certifies that a copy of this submission has been posted on the OneChicago website.

OneChicago staff has reviewed the core principles applicable to DCMs, and has concluded that the proposed rule amendment may have some bearing upon the following core principles:

Core Principle 5: Core Principle 5 requires that a DCM adopt position limits or position accountability to reduce the potential threat of market manipulation or congestion. This rule amendment supports Core Principle 5 in that it adjusts position limits for OneChicago products pursuant to Commission regulation § 41.25.

If you have any questions or comments related to this filing, please feel free to contact me by telephone at (312) 883-3436 or through e-mail at gdeese@onechicago.com.

Respectfully Submitted,

Graham Deese
Market Regulation Analyst
OneChicago, LLC
Encl: Attachment A

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Attachment A

(See Following Page)

8 APRIL 2019

UPDATING POSITION LIMITS

Effective Date

April 23, 2019

Position Limits have been amended in accordance with the table below:

		Previous	New
BBD	Banco Bradesco S.A.	13,500	22,500
FOX	Fox Corporation	13,500	PA[1]
FOXA	Fox Corporation	13,500	PA
GG	Goldcorp, Inc.	13,500	22,500
NBR	Nabors Industrials Ltd.	22,500	13,500
KO	The Coca-Cola Company	13,500	22,500
RIG	Transocean Ltd.	22,500	13,500
SWN	Southwestern Energy Company	PA	22,500
XLU	Utilities Select Sector SPDR Fund	22,500	PA

[1] PA refers to Position Accountability. Please see OneChicago Rule 414 for more information.

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