

**Product Submission by ForecastEx LLC – Pursuant to 17 C.F.R. §§ 40.2**

August 14, 2024  
SUBMITTED VIA CFTC PORTAL  
Secretary of the Commission  
Office of the Secretariat  
U.S. Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, D.C. 20581

**Re: ForecastEx LLC – CFTC Regulation 40.2(a) Notification Regarding the Initial Listing of “US Debt Ceiling Forecast Contract”**

Dear Mr. Kirkpatrick,

Pursuant to Section 5c(c) of the Commodity Exchange Act and Section 40.2(a) of the regulations of the Commodity Futures Trading Commission, ForecastEx LLC (“ForecastEx” or the “Exchange”) hereby notifies the Commission that it is self-certifying the “US Debt Ceiling Forecast Contract”. ForecastEx will list an Event Market corresponding to each release of the Debt Limit.

The submission includes:

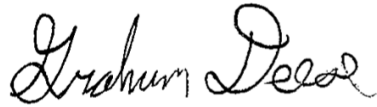
A concise explanation, analysis and background of the Contract;

- Certification;
- Appendix A with the Contract’s Terms and Conditions;
- Confidential Appendices with further information; and
- A request for FOIA confidential treatment.

The Exchange certifies that this submission (other than those appendices for which confidential treatment has been requested) has been concurrently posted on the Exchange’s website.

Any questions regarding this filing, as well as any notices pursuant to Commission Regulation 40.2, should be directed to the attention of the undersigned at [gdeese@forecastex.com](mailto:gdeese@forecastex.com) or 630-743-9013.

Respectfully submitted,

A handwritten signature in black ink that reads "Graham Deese". The signature is written in a cursive style with a large, prominent 'G' and 'D'.

Graham Deese  
ForecastEx Chief Regulatory Officer

Encl. (Appendix A)

cc: David Downey, ForecastEx Chief Executive Officer  
Andrew Naughton, ForecastEx Chief Financial Officer

**Attachments:**

Appendix A - Contract Terms and Conditions

Appendix B (Confidential) – Explanation and Analysis of the Product

Appendix C (Confidential) – Certification that Contracts are not Readily Susceptible to Manipulation

## Appendix A – Contract Terms and Conditions

**Event Question:** Will Congress raise or suspend the debt ceiling by [date]?

**Product Code:** USDC

**Instructions:** The Debt Ceiling is the total amount of monies that the US Government is authorized to borrow. Raising or suspending the debt ceiling requires a public law to be enacted by Congress. United States Code is the codification of the general and permanent laws of the United States. The debt ceiling, as enacted by Congress through public laws is codified in US Code. The Debt ceiling is currently suspended through January 1, 2025.

**Underlying:** The underlying for US Debt Ceiling Forecast Contracts is the public laws enacted by Congress and recorded in US Code. The section of US Code that contains the debt ceiling limit can be accessed [here](#). The Underlying is listed in US Code, Title 31, Subtitle III, Chapter 31, Subchapter I, §3101(b). Pub. L. 118–5, div. D, §401, June 3, 2023, 137 Stat. 48 states that this section of US Code is suspended until January 1, 2025. As described [here](#), each section of US Code has a currency date displayed above the text of the section. When a new public law is enacted, the US Code section will identify that there are pending updates to the US Code section and details of that pending update will identify the Public Laws which enacted the change. A public law which suspends the debt ceiling will be described below the debt ceiling limit under the section entitled “Statutory Notes and Related Subsidiaries: Temporary Debt Limit Extension”. Public Laws can viewed in the Library of Congress’s congress.gov database. If there is a pending update to US Code based on a newly enacted Public Law that impacts the resolution of the contract, ForecastEx will settle the contract on the basis of those enacted Public Laws. The links above are provided for informational purposes only and may be published to a different location at any time.

**Source Agency:** The Public Laws of the United States

**Minimum Tick:** The Minimum Tick size for the referred Contract shall be \$0.01

**Listing Cycle:** ForecastEx will list an expiration for one single contract based on either the current end to the debt limit suspension or for the projected date the debt limit will be exceeded. If the debt ceiling is not raised or suspended by the expiration of the Contract, ForecastEx will list 30 day contracts corresponding with the month’s end until the limit is raised or suspended again.

**Thresholds:** ForecastEx will list a single contract per expiration.

**Position Accountability:** The position accountability level is 250,000 Forecast Contracts in any one Event Market.

**Last Trading Time:** 3:59:59 PM CT on the trading day of Resolution Time.

**Payout Criteria:** The Settlement Value of each US Debt Ceiling Contract is \$1.00 or \$0 depending on the Outcome of the Event Question. If the Outcome of the Event Question is “Yes”, then holders of the “Yes” Position will be entitled to receive the Settlement Value of \$1.00 per contract and holders of the “No” Position will receive \$0.00. If the Outcome of the Event Question is “No”, then holders of the “No” Position will be entitled to receive the Settlement Value of \$1.00 per contract and holders of the “Yes” Position will receive \$0.00.

**Resolution Time:** 11:01 PM CT on the date preceding the date in the Event question.

**Changes in Resolution Time:** The Resolution Time may change due to an act of Congress raising or suspending Debt Ceiling. In the event that the United States Congress passes legislation regarding the Debt Ceiling, ForecastEx will resolve the contracts by accelerating the Resolution Time in accordance with Rule 413(b). In this case, ForecastEx would release a public notice to its website informing Market Participants that the Resolution of the Contract has been expedited.

**Expiration Time:** Same as Resolution time.

**Settlement Time:** Settlement for Resolved US Debt Ceiling Contracts will occur after Resolution Time at 13:00 PM CT that following Business Day in accordance with ForecastEx Rule 603(b)(3).