



Ms. Melissa Jurgens  
Secretary  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.B.  
Washington, D.C. 20581

August 13, 2014

Re: Listing of Security Futures Products

Dear Ms. Jurgens

Pursuant to section 5c(c)(1) of the Commodity Exchange Act, as amended (the "Act"), and section 41.23 of the regulations promulgated by the Commission under the Act, submitted herewith are contract specifications for a new product or products, as appropriate, (the "New Product") that will be listed for trading on OneChicago, LLC ("OneChicago") effective, 08/20/14. The New Product will be subject to the Rules set forth in Chapter IX of the OneChicago rulebook, as supplemented by the specifications attached hereto as Appendix A.

On behalf of OneChicago, I hereby certify that: (a) the security underlying the New Product satisfies the requirements of section 41.21 of the regulations promulgated by the Commission under the Act; (b) arrangements are in place with a clearing agency registered pursuant to section 17A of the Securities Exchange Act of 1934 (the "Exchange Act") for the payment and delivery of the security underlying the New Product; (c) only futures commission merchants, introducing brokers, commodity trading advisors, commodity pool operators or associated persons subject to suitability rules comparable to those of a national securities association registered pursuant to section 15A(a) of the Exchange Act and the rules and regulations thereunder, except to the extent otherwise permitted under the Exchange Act and the rules and regulations thereunder, may solicit, accept any order for, or otherwise deal in any transaction in or in connection with the New Product; (d) dual trading in the New Product is restricted in accordance with section 41.27 of the regulations promulgated by the Commission under the Act; (e) trading in the New Product is not readily susceptible to manipulation of the price of any New Product, nor to causing or being used in the manipulation of the price of any underlying security, option on such security, or option on a group or index including such security, consistent with the conditions for trading of section 41.25 of the regulations promulgated by the Commission under the Act; (f) procedures are in place for coordinated surveillance among OneChicago, any market on which the security underlying a New Product is traded and other markets on which any related security is traded to detect manipulation and insider trading; (g) an audit trail is in place to facilitate coordinated surveillance among OneChicago, any market on which the security underlying the New Product is traded, and any market on which any related security is traded; (h) procedures are in place to coordinate regulatory trading halts between OneChicago and markets on which the security underlying the New Product is traded and other markets on which any related security is traded; and (i) the margin requirements for the New Product will comply with the provisions specified in sections 41.43 through 41.49 of the regulations promulgated by the Commission under the Act.

On behalf of OneChicago, I hereby further certify that the New Product complies with the additional conditions for trading set forth in section 41.25 of the regulations promulgated by the Commission under the Act, and complies with the Act and the regulations thereunder.

/s/ Thomas McCabe  
Chief Operating Officer  
OneChicago, LLC