November 15, 2018

BY ELECTRONIC SUBMISSION

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

Re: CFTC Regulation 40.6(a) Certification: Notification of Rulebook Changes Following Delisting of Interest Rates Swap Futures Products (Eris Exchange, LLC Submission #2018-04)

Dear Mr. Kirkpatrick:

Eris Exchange, LLC ("Eris Exchange" or the "Exchange") is notifying the Commodity Futures Trading Commission (the "Commission") that on December 3, 2018, the Exchange will delist all of its Interest Rate Swap Futures (the "IRS Futures"). Pursuant to an agreement with Chicago Mercantile Exchange Inc. ("CME") to transfer substantially all IRS Futures contract open interest to the Board of Trade of the City of Chicago, Inc. ("CBOT"), and with the expiration of the remaining IRS Futures contracts occurring prior to December 3, 2018, there will be no open interest in the IRS Futures products on the date of delisting. Accordingly, the Exchange is self-certifying amendments to Rules 533 ("Position Limit, Position Accountability, Reportable Level, and Volume Threshold Level Table"), 539 ("Trade Cancelations and Price Adjustments"), 601 ("Block Trades"), and 1101 ("Contract Specifications") of the Exchange Rulebook to remove references to the IRS Futures. The Amendments to these rules are attached hereto.

Core Principle Compliance
The Exchange's staff has assessed the Amendments to these rules in light of the delisting of the IRS Futures from the Exchange, and their compliance with applicable provisions of the Commodity Exchange Act. Eris Exchange has identified that the following designated contract market core principle ("Core Principle") may be potentially impacted: Prevention of Market Disruption. At the time that the rule amendments become effective, the IRS Futures will have no open interest, and therefor there will be no market disruptions as a result of either the rule changes.

Public Information
A notice and copy of this submission is posted on the Eris Exchange website at http://www.erisfutures.com/cftc-submissions.

Opposing Views
This submission was provided to the Regulatory Oversight Committee and there were no opposing views to this Program.

Certification
Eris Exchange, LLC hereby certifies to the Commodity Futures Trading Commission, pursuant to the procedures set forth in Commission regulation §40.6, that this submission complies with the Commodity Exchange Act, as amended, and the regulations promulgated thereunder.

If you have any questions please contact me at the information below or Laurian Cristea, General Counsel, at laurian.cristea@erisfutures.com or 646-961-4487.

Sincerely yours,

David Karrow
Chief Regulatory Officer &
Senior Counsel
(p) 312.626.2698
david.karrow@erisfutures.com

EXHIBIT A

Amended Rules

(attached)

(2) Positions at or above the Reportable Futures Level in a discrete Commodity Code trigger reportable status. For a person in reportable status in a discrete Commodity Code, all positions, regardless of size, in the same discrete Commodity Code must be reported.

For the avoidance of doubt, if the discrete Commodity Code that triggers the reportable status is a Contract with a A9102 Commodity Code, then all other positions in Contracts with a A9102 Commodity Code would be required to be reported under this Rule 532(b). Any other discrete Commodity Codes (i.e., A0004, A0006, other A*nnnn* Commodity Codes, B*nnnn* Commodity Codes, C*nnnn* Commodity Codes, or D*nnnn* Commodity Codes) would not be required to be reported (provided that such A0004, A0006, other A*nnnn* Commodity Codes, B*nnnn*, Commodity Codes, C*nnnn* Commodity Codes, or D*nnnn* Commodity Codes have not independently triggered reportable status).

(3) All Large Trader Reports shall be submitted in a form acceptable to the Market Regulation Department. The Exchange may require that more than one Large Trader Report be submitted daily. The Regulatory Oversight Committee or the Market Regulation Department may require reports from any Clearing Firm on a lesser number of positions than reflected in the Table in Rule 533.

(b) Ownership and Control Reporting

(1) Clearing Firms must provide the Market Regulation Department with the required CFTC Form 102A and/or Form 102B identifying the owner, any controlling parties and any additional required information for each reportable account. A reportable account for the purposes of this Rule 532(b)(1) is an account at or above the Reportable Futures Level and/or the Volume Threshold Reportable Level as identified in the table in Rule 533.

(2) The applicable Form 102A and/or Form 102B must be submitted to the Market Regulation Department no later than 9:00 am Eastern Time on the Business Day following the date on which the account becomes reportable. Additionally, Clearing Firms must submit a revised form reflecting any material changes to the information previously provided to the Market Regulation Department within three Business Days of such changes becoming effective. In the absence of any material changes, the Exchange may require electronic submission of a new Form 102A and/or Form 102B on an annual basis for the maintenance of accurate records.

RULE 533. Position Limit, Position Accountability, Reportable Level, and Volume Threshold Level Table

The reportable levels for all Contracts are set forth in the Position Limit, Position Accountability, Reportable Level, and Volume Threshold Level Table below. For purposes of the Large Trader Report, Contracts shall be reported according to discrete Commodity Code. The Commodity

Code shall be the Contract's Clearing Code, as defined in Rule 1101, absent the Z at the beginning of the code. The Commodity Code is an alpha-numeric code that consists of two components. The first component is the letter at the beginning of the code, which represents the tenor of the contract. The second component of the Commodity Code is the 4 numbers that follow the letter (i.e., "*nnnn*" in the Table below). These 4 numbers represent each unique contract, meaning a contract with a different coupon and/or a different first trade date, for any given maturity date. For example, a Contract with a Clearing Code of ZA0004 shall have a Commodity Code of A0004 and a Contract with a Clearing Code of ZA0006 shall have a Commodity Code of A0006. For purposes of the Large Trader Report, all Contracts in the respective Commodity Code (i.e., A0004 or A0006) shall be grouped in order to determine reportable futures level and position accountability. The reportable level is the net long position or the net short position for each discrete Commodity Code. Pursuant to Rule 909, concurrent long and short positions must be reported to the Exchange for both sides as open positions (i.e., net long positions or net short positions).

Position Limit, Position Accountability, Reportable Level, and Volume Threshold Level Table:

Contract Name	Commodity Code	Tenor of each discrete Commodity Code	Reportable Futures Level for each discrete Commodity Code (Large Trader Report and Form 102A)	Position Accountability for each discrete Commodity Code	Position Limit for each discrete Commodity Code	Volume Threshold Reportable Level for each discrete Commodity Code (Form 102B)
~~Interest Rate Swap Futures Contract~~	~~A*nnnn*~~	~~Less than or equal to 2 years~~	~~3000~~	~~6000~~	~~N/A~~	~~250~~
~~Interest Rate Swap Futures Contract~~	~~B*nnnn*~~	~~Greater than 2 years and less than or equal to 5 years~~	~~3000~~	~~6000~~	~~N/A~~	~~250~~
~~Interest Rate Swap Futures Contract~~	~~C*nnnn*~~	~~Greater than 5 years and less than or equal to 10 years~~	~~3000~~	~~6000~~	~~N/A~~	~~250~~
~~Interest Rate Swap Futures Contract~~	~~D*nnnn*~~	~~Greater than 10 years~~	~~3000~~	~~6000~~	~~N/A~~	~~250~~

RULE 534. The Eris Trading System Access Restrictions

(a) All Participants permissioned to connect to the Eris Trading System, including direct connections of Participants, to the extent permitted by the Exchange, must be guaranteed by a Clearing Firm that assumes financial responsibility for Participant. With respect to transactions given up to other Clearing Firms, such guarantee is effective only until such time that the other Clearing Firm accepts the trade. A trade given up to another Clearing Firm will

Price/Time algorithm, orders will be matched with the earliest bid or offer to arrive in the Eris Trading System at the best price. If there are multiple bids and offers that have the same price, the earliest to arrive in the Eris Trading System will be the bid or offer to which the order is matched. If the order exceeds the quantity of the bid or offer, the Participant will be filled at the next, best bid or offer for their order.

(b) Information on the operation of the matching algorithms is available at www.erisfutures.com

RULE 539. Trade Cancellations and Price Adjustments

(a) Eris Exchange Control Center Authority Regarding Trade Cancellations and Price Adjustments

(1) The Eris Exchange Control Center ("ECC") has authority to adjust trade prices or cancel (bust) trades when such action is necessary to mitigate market disrupting events caused by the improper or erroneous use of the Eris Trading System or by system defects.

(2) Notwithstanding any other provisions of this Rule, the ECC may adjust trade prices or bust any trade if the ECC determines that allowing the trade to stand as executed may have a material, adverse effect on the integrity of the market.

(3) All decisions of the ECC shall be final.

(b) Review of Trades

(1) The ECC may determine to review a trade based on its independent analysis of market activity or upon request for review by a user of the Eris Trading System. A request for review must be made within 15 minutes of the execution of the trade.

(2) The ECC shall determine whether or not a trade will be subject to review. In the absence of a timely request for review, during volatile market conditions, upon the release of significant news, or in any other circumstance in which the ECC deems it to be appropriate, the ECC may determine, in its sole discretion, that a trade shall not be subject to review.

(3) Upon deciding to review a trade, the ECC will promptly issue an alert to all Participants via the Eris Trading System or electronic mail indicating that the trade is under review.

(c) Price Adjustments and Cancellations

(1) In reviewing a trade, the ECC will first determine whether the trade price is within the No Bust Range for futures or within the Bid/Ask Reasonability Allowance for options, as described in Rule 539(g). The Bid/Ask Reasonability Allowance for an option is the maximum width of the bid/ask range which will be considered reasonable for use in applying the parameters necessary to establish the No Bust Range for the option.

(2) In applying the No Bust Range, the ECC shall determine the fair value market price for that contract at the time the trade under review occurred. The ECC may consider any relevant information, including, but not limited to, the last trade price in the contract or a

better bid or offer price on the Eris Trading System, a more recent price for a different maturity date, the price of the same or related contract established in another venue or another market, the market conditions at the time of the trade, the theoretical value of an option based on the most recent implied volatility and responses to a Request for Quote (RFQ).

(3) Trade Price Inside the No Bust Range.

If the ECC determines that the price of the trade is inside the No Bust Range, the ECC will issue an alert indicating that the trade shall stand.

(4) Trade Price Outside the No Bust Range

i. Futures Contracts

If the ECC determines that a trade price is outside the No Bust Range for a futures contract, the trade price shall be adjusted to a price that equals the fair value market price for that contract at the time the trade under review occurred, plus or minus the No Bust Range. In the event there are multiple parties, prices and/or contracts involved in the transactions at issue, the ECC has the authority, but not the obligation, to bust rather than price adjust such transactions. The ECC will issue an alert regarding its decision.

ii. Option Contracts

If the ECC determines that a trade price is outside the applicable No Bust Range for an option contract, the trade price shall be adjusted. In the case of a buy (sell) error, the price will be adjusted to the determined ask (bid) price set forth in the Bid/Ask Reasonability Allowance in Section G plus (minus) the No Bust Range. In the event there are multiple parties, prices and/or contracts involved in the transactions at issue, the ECC has the authority, but not the obligation, to bust rather than price adjust such transactions. The ECC will issue an alert regarding its decision.

iii. Busted trade prices and any prices that have been adjusted shall be cancelled in the Exchange's official record of time and sales. Trades that are price adjusted shall be inserted in the time and sales record at the adjusted trade price.

(d) Alternative Resolution by Agreement of Parties

(1) With the approval of the ECC, parties to a trade that is price adjusted may instead mutually agree to cancel the trade.

(2) With the approval of the ECC, parties to a trade that is busted may instead mutually agree to price adjust the trade to a price consistent with the adjustment provisions of Rule 539(c).

(3) Subject to section (d)(1) and (d)(2), parties to a trade that is cancelled or price adjusted may mutually agree to a cash adjustment provided that such adjustments are reported to the ECC and the parties maintain a record of the adjustment.

(4) An executed trade may not be reversed via transfer except where such trade is determined by ECC to be outside of the No Bust Range but not reported timely, subject to agreement of the parties and approval of the ECC. Any such transfer must occur at the original trade price and quantity; however the parties may mutually agree to a cash adjustment.

(e) Liability for Losses Resulting from Price Adjustments or Cancellations

(1) A party entering an order that results in a price adjustment or trade bust shall be responsible for demonstrated claims of realized losses incurred by persons whose trade prices were adjusted or busted provided, however, that a claimant shall not be entitled to compensation for losses incurred as a result of the claimant's failure to take reasonable actions to mitigate the loss.

(2) A claim for a loss pursuant to this section must be submitted to the Exchange on an Exchange claim form within one business day of the event giving rise to the claim. The Exchange will reject any claim that is not filed in a timely manner and such decisions shall be final. Eligible claims shall be forwarded by the Exchange to the party responsible for the order(s) that resulted in a trade bust or a price adjustment and to the Clearing Firm through which the trade was placed. Such party, or the Clearing Firm on behalf of the party, shall, within ten business days of receipt of the claim, admit or deny responsibility in whole or in part. Failure to respond to the claim within ten business days shall be considered a denial of liability.

(3) To the extent that liability is admitted, payment shall be made within ten business days. Unless otherwise agreed upon in writing by the parties, failure to make the payment within ten business days shall be considered a denial of liability for purposes of this rule. A copy of any such written agreement must be provided to the Exchange.

(4) To the extent that liability is denied, the party making the claim may submit the claim for arbitration pursuant to Chapter 8 of the Rules. Such claims must be submitted to the ECC within ten business days of the date the party was issued notification that liability was denied.

(f) Schedule of Administrative Fees

(1) When ECC busts or price adjusts a trade, the party responsible for entering the order into the Eris Trading System that gave rise to the trade bust or price adjustment shall pay an administrative fee to the Exchange in the amount of $500 for each such occurrence.

(g) Eris Exchange No Bust Ranges

Futures Contract	No Bust Range
~~Interest Rate Swap Futures Contract~~	~~The price equivalent of 7 basis points from the ECCs determination of fair market value.~~

CHAPTER 6: PRIVATELY NEGOTIATED TRANSACTIONS

RULE 601. Block Trades

(a) The Exchange shall designate the products in which block trades shall be permitted and determine the minimum quantity thresholds for such transactions.

(b) The following shall govern block trades:

(1) A block trade must be for a quantity that is at or in excess of the applicable minimum threshold. Orders may not be aggregated in order to achieve the minimum transaction size, except by those entities described in Sections (10) and (11) below and as provided in Rule 601(b)(2).

(2) Multi-legged block trades may be executed as block trades, provided that the sum of the legs of the block trade meets the Minimum Block Size for the leg with the shortest Remaining Tenor as provided in Rule 601(c)(1).

(3) Each Person to a block trade must be an Eligible Contract Participant.

(4) A broker for a Person shall not execute any order by means of a block trade for a Person unless such Person has specified that the order be executed as a block trade.

(5) The price at which a block trade is executed must be fair and reasonable in light of (i) the size of the block trade, (ii) the prices and sizes of other transactions in the same contract at the relevant time, (iii) the prices and sizes of transactions in other relevant markets, including without limitation the underlying cash market or related futures markets, at the relevant time, and (iv) the circumstances of the markets or the Participants to the block trade.

(6) Block trades shall not set off conditional orders (e.g., Stop Orders and MIT Orders) or otherwise affect orders in the regular market.

(7) One of the Persons or the broker of one of the Persons to the block trade must ensure that each block trade is reported to the Exchange within the time limit set forth below:

a. Block trades in Eris Standards during RTH must be reported within 15 minutes of the transaction
b. Block trades in Eris Flexes during RTH must be reported to the Exchange within 15 minutes of the transaction, or by 4:35 pm ET (whichever comes first).
c. All block trades executed during OTH must be reported within the later of fifteen minutes after trade execution or five minutes prior to the next market open.

The Exchange shall promptly publish such information separately from the reports of transactions in the regular market.

(8) Reporting Method and Information

a. Block trades must be reported to the Exchange by calling the Eris Control Center, through entry into Eris BlockBox, or in accordance with another approved reporting method.
b. The block trade report must include the information related to the block trade specified in the Exchange's approved reporting method, including: the identification of parties to the block trade; product details; trade quantity, price, and time; and, Clearing Firm.

(9) Clearing Firms, Participants, Participant Firms, and Broker Firms involved in the execution of block trades must maintain a record of the transaction in accordance with Rules 401.

(10) A commodity trading advisor ("CTA") registered or exempt from registration under the Act, including, without limitation, any investment advisor registered or exempt from registration under the Investment Advisors Act of 1940, or principal thereof, shall be the applicable entity for purposes of Sections (1), (3), (4) and (5), provided such advisors have total assets under management exceeding $25 million and the block trade is suitable for the customers of such advisors.

(11) A foreign Person performing a similar role or function to a CTA or investment advisor as described in Section 10, or principal thereof, and subject as such to foreign regulation, shall be the applicable entity for purposes of Sections (1), (3), (4) and (5), provided such Persons have total assets under management exceeding $25 million and the block trade is suitable for the customers of such Persons.

(c) Products designated for Block Trades.

The following products are designated for block trades:

(1) RESERVED ~~INTEREST RATE SWAP FUTURES CONTRACTS: For Interest Rate Swap Futures Contracts, the minimum block size is based on Remaining Tenor, defined as the duration of time from the transaction date to the Cash Flow Alignment Date (defined in Rule 1101), of the Contract as follows:~~

~~-~~	~~**Minimum Block Size**~~	
~~**Remaining Tenor**~~	~~Trading Hours: RTH~~	~~Trading Hours: OTH~~
~~Less than 5 years~~	~~$10mm notional~~ ~~100 contracts~~	~~$1.0mm notional~~ ~~10 contracts~~
~~5 years or more~~	~~$10mm notional~~ ~~100 contracts~~	~~$0.5mm notional~~ ~~5 contracts~~

CHAPTER 11: CONTRACT SPECIFICATIONS

RULE 1101. RESERVED

~~Eris Interest Rate Swap Futures Contract Specifications~~