

**SUBMISSION COVER SHEET**

**IMPORTANT:** Check box if Confidential Treatment is requested

Registered Entity Identifier Code (optional): 19-433 (2 of 2)

Organization: Chicago Mercantile Exchange Inc. ("CME")

Filing as a: DCM SEF DCO SDR

Please note - only ONE choice allowed.

Filing Date (mm/dd/yy): 12/18/19

Filing Description: Initial Listing of Block Cheese Futures and Options on Block Cheese Futures Contracts

**SPECIFY FILING TYPE**

Please note only ONE choice allowed per Submission.

**Organization Rules and Rule Amendments**

- |                          |                                     |            |
|--------------------------|-------------------------------------|------------|
| <input type="checkbox"/> | Certification                       | § 40.6(a)  |
| <input type="checkbox"/> | Approval                            | § 40.5(a)  |
| <input type="checkbox"/> | Notification                        | § 40.6(d)  |
| <input type="checkbox"/> | Advance Notice of SIDCO Rule Change | § 40.10(a) |
| <input type="checkbox"/> | SIDCO Emergency Rule Change         | § 40.10(h) |

**Rule Numbers:**

**New Product**

Please note only ONE product per Submission.

- |                                     |                                       |            |
|-------------------------------------|---------------------------------------|------------|
| <input checked="" type="checkbox"/> | Certification                         | § 40.2(a)  |
| <input type="checkbox"/>            | Certification Security Futures        | § 41.23(a) |
| <input type="checkbox"/>            | Certification Swap Class              | § 40.2(d)  |
| <input type="checkbox"/>            | Approval                              | § 40.3(a)  |
| <input type="checkbox"/>            | Approval Security Futures             | § 41.23(b) |
| <input type="checkbox"/>            | Novel Derivative Product Notification | § 40.12(a) |
| <input type="checkbox"/>            | Swap Submission                       | § 39.5     |

**Official Product Name:** Block Cheese Futures & Options on Block Cheese Futures

**Product Terms and Conditions (product related Rules and Rule Amendments)**

- |                          |   |                      |
|--------------------------|---|----------------------|
| <input type="checkbox"/> | Certification   | § 40.6(a)            |
| <input type="checkbox"/> | Certification Made Available to Trade Determination     | § 40.6(a)            |
| <input type="checkbox"/> | Certification Security Futures                          | § 41.24(a)           |
| <input type="checkbox"/> | Delisting (No Open Interest)                            | § 40.6(a)            |
| <input type="checkbox"/> | Approval  | § 40.5(a)            |
| <input type="checkbox"/> | Approval Made Available to Trade Determination          | § 40.5(a)            |
| <input type="checkbox"/> | Approval Security Futures                               | § 41.24(c)           |
| <input type="checkbox"/> | Approval Amendments to enumerated agricultural products | § 40.4(a), § 40.5(a) |
| <input type="checkbox"/> | "Non-Material Agricultural Rule Change"                 | § 40.4(b)(5)         |
| <input type="checkbox"/> | Notification  | § 40.6(d)            |

**Official Name(s) of Product(s) Affected:**

**Rule Numbers:**

December 18, 2019

**VIA ELECTRONIC PORTAL**

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

**Re: CFTC Regulation 40.2(a) Certification. Notification Regarding the Initial Listing of Block Cheese Futures and Options on Block Cheese Futures Contracts. CME Submission No. 19-433 (2 of 2)**

Dear Mr. Kirkpatrick:

Chicago Mercantile Exchange, Inc. ("CME" or "Exchange") hereby notifies the Commodity Futures Trading Commission ("CFTC" or "Commission") that it is self-certifying the initial listing of Block Cheese Futures and Options on Block Cheese Futures contracts (the "Contracts") effective on Sunday, January 12, 2020 for trade dated Monday, January 13, 2020.

Specifically, Block Cheese Futures will be listed for trading on the CME Globex electronic trading platform ("CME Globex") and for submission for clearing via CME ClearPort. Options on Block Cheese Futures will be listed for trading on CME Globex and the CME trading floor, and for submission for clearing via ClearPort.

<i>Contract Title/Commodity Code/Rulebook Chapter</i>	<i>Commodity Code</i>	<i>CME Rulebook Chapter</i>
<b>Block Cheese Futures</b>	BLK	61
<b>Options on Block Cheese Futures</b>	BLK	61A

In what follows:

- Section 1 summarizes contract terms and conditions.
- Section 2 addresses compliance of the Contract terms and conditions certified herein with the pertinent Core Principles for Designated Contract Markets ("Core Principles") set forth in the Act.

The CME Rulebook chapters governing contract terms and conditions for all Contracts certified herein appear in Appendixes A & B. Appendix C addresses the applicable position limits and reportable position levels pursuant to Chapter 5 of the CME Rulebook and Appendix D provides the market overview and analysis of deliverable supply in support of the related position limits. Appendix E sets forth the applicable CME Globex non-reviewable trading ranges as prescribed in CME Rule 588.H.

## Section 1: Contract Terms and Conditions

	<u>Block Cheese Futures</u>	<u>Options on Block Cheese Futures</u>
<b>Commodity Code</b>	BLK	BLK
<b>CME Rulebook Chapter</b>	61	61A
<b>Listing Schedule</b>	24 consecutive months	
<b>Initial Listing Months</b>	February 2020 - January 2022	
<b>Minimum Price Increments</b>	\$0.001 per pound (\$20/contract)	\$0.001 per pound (\$20/contract) - Full Tick
		\$0.0005 per pound (\$10/contract) - Half Tick
<b>Option Type</b>		American Style
<b>Strike Price Listing Procedures</b>		Strikes listed for 35% of the underlying settlement price above and below the at-the-money strike at \$0.025 per pound increments in all months
<b>Exercise Procedure</b>		Any business day that the option is traded until 7:00pm CT
<b>Termination Of Trading</b>	Trading shall terminate on the business day immediately preceding the release date for the USDA monthly weighted average price in the U.S. for 40-pound block cheddar cheese. LTD close is at 12:10 p.m. Central Time.	
<b>Delivery</b>	Delivery is by cash settlement by reference to the USDA monthly weighted average price in the U.S. for 40-pound block cheddar cheese	
<b>Single Month Position Limits</b>	1,000 contracts	1,000 contracts
<b>Reportable Level</b>	25 contracts	25 contracts
<b>Block Trade Minimum</b>	5 contracts	5 contracts
<b>Block Trade Reporting Window</b>	5 minutes	15 minutes
<b>CME Globex Matching Algorithm</b>	F: First In, First Out (FIFO)	

As noted, CME is also notifying the CFTC that it is self-certifying block trading in the Contracts with a minimum block threshold level of 5 contracts in Block Cheese Futures and 5 contracts in Options on Block Cheese Futures, which represents 100,000 pounds of block cheddar cheese.

The Exchange is also self-certifying pre-execution communication via the G-Cross and R-Cross protocols in Block Cheese Futures during CME Globex electronic trading hours. It is self-certifying pre-execution communication via the R-Cross protocols in Options on Block Cheese Futures during the CME Globex electronic trading hours as well. Both are currently noted in CME Rule 539.C. (“Crossing Protocols Table”).

### Trading and Clearing Hours:

CME Globex, Trading Floor, and CME ClearPort	<b>Futures and Options on CME Globex:</b> Sundays at 5:00 p.m. through Friday at 1:55 p.m. with daily trading halts from 4:00 p.m. to 5:00 p.m. Chicago Time/CT
	<b>Futures and Options via CME ClearPort:</b> Sunday – Friday 5:00 p.m. – 4:00 p.m. CT with a 60–minute break each day beginning at 4:00 p.m. CT
	<b>Trading Floor (Options only):</b> Mon-Fri: 9:05 a.m. – 1:12 p.m. CT (LTD 12:10 p.m. CT)

### Exchange Fees:

Membership Type	Venue/Transaction Type	Fee
Individual Members Clearing Members Rule 106.J Equity Member Firms & Rule 106.J Qualified Subsidiaries Rule 106.I Members & Rule 106.I Qualified Affiliates Rule 106.S Member Approved Funds	Open Outcry	\$0.15
	CME Globex	\$0.51
	EFP	\$1.90
	EFR	\$1.90
	Block	\$1.90
	Delivery	\$0.15
	Exe Asn Future From	\$0.20
Rule 106.D Lessees Rule 106.F Employees	Open Outcry	\$0.31
	CME Globex	\$0.67
	EFP	\$2.06
	EFR	\$2.06
	Block	\$2.06
	Delivery	\$0.31
Rule 106.R Electronic Corporate Members (For other than CME Globex - Non-Member rates apply)	CME Globex	\$0.81
	Exe Asn Future From	\$0.36
Rule 106.H and 106.N Firms	Open Outcry	\$0.49
	CME Globex	\$0.81
	EFP	\$2.24
	EFR	\$2.24
	Block	\$2.24
	Delivery	\$0.49
	Exe Asn Future From	\$0.54

International Incentive Program (IIP) and International Volume Incentive Program (IVIP) Participants (Open Outcry at same rate as Globex for Interest Rate products only)	CME Globex	\$0.81
Central Bank Incentive Program (CBIP), Emerging Markets Bank Incentive Program (EMBIP), Latin American Fund Manager Incentive Program (FMIP), Participants (For other than CME Globex - Non-Member rates apply)	CME Globex	\$2.03
CBOE Members (For S&P products only; for all other products - Non-Member rates apply)	Open Outcry	\$0.69
	CME Globex	\$2.03
	EFP	\$2.44
	EFR	\$3.03
	Block	\$3.03
	Delivery	\$0.69
	Exe Asn Future From	\$0.74
CTA/Hedge Fund Incentive Program Participants (For other than FX CME Globex - Non-Member rates apply)	CME Globex	\$2.03
Members Trading Outside of Division (For other than CME Globex During ETH - Non-Member rates apply)	CME Globex During ETH Only	\$1.05
Non-Members	Open Outcry	\$0.69
	CME Globex	\$2.03
	EFP	\$2.44
	EFR	\$3.03
	Block	\$3.03
	Delivery	\$0.69
	Exe Asn Future From	\$0.74

Processing Fees	Fee
106.D Lessee/106.H Brokerage	\$0.13
106.F Employee Brokerage	\$0.13
Floor / "New" Brokerage	\$0.04
Position Adjustment/Position Transfer	\$0.10
Give-Up Surcharge	\$0.05
Facilitation Fee	\$0.40

## Section 2: Compliance with Core Principles

The Exchange reviewed the designated contract market core principles ("Core Principles") as set forth in the Commodity Exchange Act ("CEA" or "Act") and identified that the following Core Principles may be impacted by this initiative as follows:

- Compliance with Rules:** Trading in the Contracts will be subject to all CME Rules, including prohibitions against fraudulent, noncompetitive, unfair and abusive practices as outlined in CME Rule Chapter 4, the Exchange's trade practice rules, the majority of which are contained in Chapter 5 and Chapter 8 of the CME Rulebook, and the dispute resolution and arbitration procedures of CME Rule Chapter 6. As with all products listed for trading on one of CME Group's designated

contract markets, trading activity in the Contract will be subject to monitoring and surveillance by CME Group's Market Regulation Department. The Market Regulation Department has the authority to exercise its investigatory and enforcement power where potential rule violations are identified.

- **Contracts not Readily Subject to Manipulation:** The Contracts are not readily subject to manipulation because of their structural attributes and active underlying market. Final settlements are based on the volume-weighted average price of block cheddar cheese as published by the United States Department of Agriculture ("USDA").
- **Prevention of Market Disruption:** Trading in the Contracts will be subject to the rules of the Exchange, which include prohibitions on manipulation, price distortion, and disruption to the cash settlement process. As with any new product listed for trading on a CME Group designated contract market, trading activity in the option contract proposed herein will be subject to monitoring and surveillance by CME Group's Market Regulation Department.
- **Position Limitations or Accountability:** The speculative position limits for the Contracts as demonstrated in this submission are consistent with the Commission's guidance.
- **Emergency Authority:** As with all CME Group futures and options product, the Exchange shall have full authority to act appropriately and as necessary in emergency situations.
- **Availability of General Information:** The Exchange will publish on its website information in regard to contract specifications, terms, and conditions, as well as daily trading volume, open interest, and price information for the Contracts. The Exchange will issue a Special Executive Report ("SER") regarding the launch of the Contracts. The SER will also be posted on the CME Group website.
- **Daily Publication of Trading Information:** The Exchange will publish contract trading volumes, open interest levels, and price information daily on its website and through quote vendors for the Contracts.
- **Execution of Transactions:** The Contracts will be listed for trading on CME Globex electronic trading platform and on the CME Group trading floor. Additionally, they will be listed for clearing through the CME ClearPort platform. The CME Globex and the trading floor venues provide competitive and open execution of transactions. CME Globex affords the benefits of reliability and global connectivity. The CME ClearPort platform provides a competitive, open and efficient mechanism for the novation of transactions that are competitively executed by brokers.
- **Trade Information:** All requisite trade information for the Contracts will be included in the audit trail and is sufficient for the Market Regulation Department to monitor for market abuse.
- **Financial Integrity of Contracts:** The Contracts will be cleared by the CME Clearing, a derivatives clearing organization registered with the CFTC and subject to all CFTC Regulations related thereto.
- **Protection of Market Participants:** CME Rulebook Chapters 4 and 5 set forth multiple prohibitions that preclude intermediaries from disadvantaging their customers. These rules apply to trading in all of the Exchange's competitive trading venues.
- **Disciplinary Procedures:** Chapter 4 of the Rulebook contains provisions that allow the Exchange to discipline, suspend or expel members or market participants that violate the Rulebook. Trading in the Contracts will be subject to Chapter 4, and the Market Regulation Department has the authority to exercise its enforcement power in the event rule violations in these products are identified.

- **Dispute Resolution:** Disputes with respect to trading in the Contract will be subject to the arbitration provisions set forth in Chapter 6 of the Rulebook. Chapter 6 allows all non-members to submit a claim for financial losses resulting from transactions on the Exchange to arbitration. A member named as a respondent in a claim submitted by a non-member is required to participate in the arbitration pursuant to Chapter 6. Additionally, the Exchange requires that members resolve all disputes concerning transactions on the Exchange via arbitration.

Pursuant to Section 5c(c) of the Act and CFTC Regulation 40.6(a), the Exchange hereby certifies that the listing of the Contracts complies with the Act, including regulations under the Act. There were no substantive opposing views to this proposal.

The Exchange certifies that this submission has been concurrently posted on the Exchange's website at <http://www.cmegroup.com/market-regulation/rule-filings.html>.

Should you have any questions concerning the above, please contact the undersigned at 212-299-2200 or via e-mail at [CMEGSubmissionInquiry@cmegroup.com](mailto:CMEGSubmissionInquiry@cmegroup.com).

Sincerely,

/s/ Christopher Bowen  
Managing Director and Chief Regulatory Counsel

Attachments: Appendix A – CME Rulebook Chapter 61  
Appendix B – CME Rulebook Chapter 61A  
Appendix C – Position Limit, Position Accountability, and Reportable Level Table in Chapter 5 of the CME Rulebook (attached under separate cover)  
Appendix D – Market Overview and Analysis of Deliverable Supply (attached under separate cover) (Confidential Treatment Requested)  
Appendix E – CME Rule 588.H. – (“Globex Non-Reviewable Trading Ranges”) Table

## **Appendix A**

### **Chapter 61 Block Cheese Futures**

#### **6100. SCOPE OF CHAPTER**

This chapter is limited in application to Block Cheese futures. In addition to this chapter, Block Cheese futures shall be subject to the general rules and regulations of the Exchange insofar as applicable.

For purposes of this chapter, unless otherwise specified, times referred to herein shall refer to and indicate Chicago time.

#### **6101. CONTRACT SPECIFICATIONS**

Each futures contract shall be valued at 20,000 times the USDA monthly weighted average price per pound in the U.S. for 40-pound block cheddar cheese.

#### **6102. TRADING SPECIFICATIONS**

##### **6102.A. Trading Months and Hours**

Futures contracts shall be scheduled for trading during such hours and final settlement in such months as may be determined by the Exchange.

##### **6102.B. Trading Unit**

The unit of trading shall be 20,000 pounds of cheddar cheese in 40-pound blocks, colored between 6 and 8 on the National Cheese Institute color chart, meeting Wisconsin State Brand, USDA Grade A, or better standards.

##### **6102.C. Price Increments**

Minimum price fluctuations shall be in multiples of \$0.0010 per pound.

##### **6102.D. Daily Price Limits**

There shall be no trading at a price more than \$0.075 per pound above or below the previous day's settlement price, except that there shall be no daily price limits in the spot month.

If any contract that is subject to a daily price limit settles on the limit bid or the limit offer, then the daily price limit shall be raised to \$0.15 per pound for all contracts subject to a daily price limit.

If, after the daily price limits have been increased to \$0.15 per pound, any contract that is subject to a daily price limit settles on the limit bid or the limit offer, then the daily price limit shall be raised to \$0.30 per pound for all contracts subject to a daily price limit.

If any contract that is subject to a daily price limit of \$0.30 does not settle at a limit bid or limit offer, without regard to market direction, the price limits shall revert to \$0.15 per pound the next Business Day.

If any contract that is subject to a daily price limit of \$0.15 does not settle at a limit bid or limit offer, without regard to market direction, the price limits shall revert to \$0.075 per pound the next Business Day.

##### **6102.E. Position Limits Exemptions, Position Accountability and Reportable Levels**

The applicable position limits and/or accountability levels, in addition to the reportable levels, are set forth in the Position Limit, Position Accountability and Reportable Level Table in the Interpretations & Special Notices Section of Chapter 5.

A Person seeking an exemption from position limits for bona fide commercial purposes shall apply to the Market Regulation Department on forms provided by the Exchange, and the Market Regulation Department may grant qualified exemptions in its sole discretion.

Refer to Rule 559 for requirements concerning the aggregation of positions and allowable exemptions from the specified position limits.

##### **6102.F. [Reserved]**

##### **6102.G. [Reserved]**

##### **6102.H. Termination of Futures Trading**

Trading shall terminate on the Business Day immediately preceding the release date for the USDA monthly weighted average price in the U.S. for 40-pound block cheddar cheese.

##### **6102.I. [Reserved]**

#### **6103. SETTLEMENT PROCEDURES**

##### **6103.A. Final Settlement**

There shall be no delivery of 40-pound block cheddar cheese in settlement of this contract. All contracts open as of the termination of trading shall be cash settled based upon the USDA monthly weighted average price in the U.S. for 40-pound block cheddar cheese.

##### **6103.B-H. [Reserved]**

#### **6104.-08. [RESERVED]**

(End Chapter 61)



## **Appendix B**

### **Chapter 61A Options on Block Cheese Futures**

#### **61A00. SCOPE OF CHAPTER**

This chapter is limited in application to options on Block Cheese futures. In addition to this chapter, options on Block Cheese futures shall be subject to the general rules and regulations of the Exchange insofar as applicable.

For purposes of this chapter, unless otherwise specified, times referred to herein shall refer to and indicate Chicago time.

#### **61A01. OPTIONS CHARACTERISTICS**

##### **61A01.A. Contract Months**

Options contracts shall be listed for such contract months and final settlement in such months as may be determined by the Exchange.

##### **61A01.B. Trading Unit**

The trading unit shall be an option to buy, in the case of the call, or to sell, in the case of the put, one Block Cheese futures contract as specified in Chapter 61.

##### **61A01.C. Minimum Fluctuations**

The price of an option shall be quoted in cents per pound. Minimum price fluctuations shall be in multiples of \$0.0010 per pound (also known as one tick). A trade may also occur at a price of \$0.0005 per pound (\$10.00, also known as one-half tick), whether or not it results in the liquidation of positions for both parties to the trade.

##### **61A01.D. Trading Hours**

The hours of trading for options on Block Cheese futures contracts shall be determined by the Exchange. Options on Block Cheese futures shall be opened and closed for all months and strike prices simultaneously.

##### **61A01.E. Exercise Prices**

The exercise prices shall be stated in terms of cents per pound. For all contract months, exercise prices shall be at intervals of \$0.025 cents; e.g., \$0.025 cents, \$0.050 cents, etc.

At the commencement of option trading in a contract month, the Exchange shall list put and call options in a range within 35 percent above and below the strike closest to the previous day's settlement price of the underlying futures contract (the at-the-money strike). If the previous day's settlement price is midway between two strikes, the at-the-money strike shall be the larger of the two.

All strikes will be listed prior to the opening of trading on the following business day. As new strikes are added, existing strikes outside of the newly determined strike ranges without open interest may be de-listed.

New-strikes may be listed for trading up to and including the termination of trading.

The Exchange may modify the provisions governing the establishment of exercise prices as it deems appropriate. The Exchange may modify the procedure for the introduction of strike prices as it deems appropriate in order to respond to market conditions.

##### **61A01.F. Position Limits, Exemptions, Position Accountability and Reportable Levels**

The applicable position limits and/or accountability levels, in addition to the reportable levels, are set forth in the Position Limit, Position Accountability and Reportable Level Table in the Interpretations & Special Notices Section of Chapter 5.

A Person seeking an exemption from position limits for bona fide commercial purposes shall apply to the Market Regulation Department on forms provided by the Exchange, and the Market Regulation Department may grant qualified exemptions in its sole discretion.

Refer to Rule 559 for requirements concerning the aggregation of positions and allowable exemptions from the specified position limits.

##### **61A01.G. [Reserved]**

##### **61A01.H. [Reserved]**

##### **61A01.I. Termination of Trading**

Options trading shall terminate on the same date and time as the underlying futures contract.

##### **61A01.J. [Reserved]**

#### **61A02. EXERCISE AND ASSIGNMENT**

In addition to the applicable procedures and requirements of Chapter 7 the following shall apply to the exercise of Block Cheese options.

**61A02.A. Exercise of Option**

The buyer of a Block Cheese futures option may exercise the option on any Business Day prior to expiration by giving notice of exercise to the Clearing House by 7:00 p.m., or by such other time designated by the Exchange, on such day.

An option that is in-the-money and has not been liquidated or exercised prior to the termination of trading shall, in the absence of contrary instruction delivered to the Clearing House by 7:00 p.m. on the Business Day following the Expiration Day by the clearing member representing the option buyer, be exercised automatically. An option is in-the-money if the final settlement price of the underlying futures contract lies above the exercise price in the case of a call, or lies below the exercise price in the case of a put.

Corrections to option exercises, including automatic exercises, may be accepted by the Clearing House after the 7:00 p.m. deadline and up to the beginning of final option expiration processing provided that such corrections are necessary due to; (1) a bona fide clerical error, (2) an unreconciled Exchange option transaction(s), or (3) an extraordinary circumstance where the clearing firm and customer are unable to communicate final option exercise instructions prior to the deadline. The decision as to whether a correction is acceptable will be made by the President of the Clearing House, or the President's designee, and such decision will be final.

**61A02.B. Assignment**

Exercise notices accepted by the Clearing House shall be assigned through a process of random selection to clearing members with open short positions in the same series. A clearing member to which an Exercise notice is assigned shall be notified thereof as soon as practicable after such notice is assigned by the Clearing House, but not later than 45 minutes prior to the opening of trading in the underlying futures contract on the following Business Day.

The clearing member assigned an Exercise notice shall be assigned a short position in the underlying futures contract if a call is exercised or a long position in the underlying futures contract if a put is exercised.

The clearing member representing the option buyer shall be assigned a long position in the underlying futures contract if a call is exercised and a short position if a put is exercised.

All such futures positions shall be assigned at a price equal to the exercise price of the option and shall be marked to market in accordance with Rule 814 on the Trading Day of acceptance by the Clearing House of the Exercise notice.

**61A03. [RESERVED]**

(End Chapter 61A)

**Appendix C**

**CME Rulebook  
Chapter 5  
("Trading Qualifications and Practices")**

**Position Limits, Position Accountability and Reportable Level Table**

(attached under separate cover)

## **Appendix D**

### **Market Overview and Analysis of Deliverable Supply**

(attached under separate cover)

**(CONFIDENTIAL TREATMENT REQUESTED)**

## Appendix E

### CME Rulebook Chapter 5 ("Trading Qualifications and Practices")

#### Rule 588.H. – ("Globex Non-Reviewable Trading Ranges") Table

Instrument Name	Globex Symbol	Outright			Spreads	
		Globex Non-Reviewable Ranges (NRR)	NRR: Globex Format	NRR: Ticks	NRR: Globex Format	NRR: Minimum Outright Ticks
<u>Block Cheese Futures</u>	<u>BLK</u>	<u>\$0.03 per pound</u>	<u>30</u>	<u>30</u>	<u>Each leg evaluated as an outright</u>	

Instrument	Globex Symbol	Bid/Ask Reasonability	Non-Reviewable Range (NRR)
<u>Options on Block Cheese Futures</u>	<u>BLK</u>	<u>The greater of the delta times the underlying futures' non-reviewable range or 20% of the fair value premium up to the underlying futures' non-reviewable range with a minimum reasonability of \$0.005</u>	<u>The greater of delta times the underlying futures non-reviewable range or 20% of premium up to 1/4 of the underlying futures' non-reviewable range with a minimum of 1 tick</u>