May 16, 2013

BY ELECTRONIC FILING: submissions@cftc.gov

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

Re: Eris Exchange Self-Certification of Rule Amendments (Rule 533 (Position Limit, Position Accountability and Reportable Level Table) and Rule 1101(Eris Interest Rate Swap Futures Contract Specifications)) (Eris Exchange Submission #2013-2013-11)

Dear Ms. Jergens:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended, (the "Act") and Commission Regulation 40.6(a), Eris Exchange, LLC ("Eris Exchange" or the "Exchange") hereby submits to the Commodity Futures Trading Commission (the "Commission") amendments to the Eris Exchange Rulebook (the "Rulebook"). Specifically, the Exchange amended Rules 533 and 1101 in order to reduce the notional value of all Eris Exchange Swap Futures Contracts ("the Contracts") from $1,000,000 to $100,000 (the "Amendments"). The Amendments will be effective on June 3, 2013.

Summary of the Amendments

The purpose of the Amendments is to facilitate the reduction in the notional value of the Contracts from $1,000,000 to $100,000.

The reportable and position accountability levels (the "Levels") for the Contracts are $300 million and $600 million notional respectively. The Amendments did not alter these Levels. However, in the interest of simplicity, the Exchange lists the Levels in Rule 533 by number of contracts. Consequently, the Exchange has amended the Position Limit and Reportable Level Table in Rule 533 to account for the decrease in the notional value of the Contracts.

Similarly, the Exchange has amended Rule 1101 to reflect the reduction in the notional value of the Contracts. Such amendments include an approximately proportional reduction in the minimum net present value ("NPV") per Contract that Market Participants can negotiate.

Additionally, the Exchange notified Market Participants of its intent to reduce the notional value of the Contracts via Market Notices sent on March 18, 2013[1] and April 4, 2013[2] (the "Notices"). The Notices also contained a summary of operational changes associated with the reduction in

[1] Available at http://www.erisfutures.com/sites/default/files/Eris%20Exchange%20Market%20Notice%20%2313-M01%20100%2C000%20Notional%20Value.pdf.
[2] Available at http://www.erisfutures.com/sites/default/files/Market_Notice_13-M03_%24100K_Notional_Value_2013-04-04.pdf.

the notional value of the Contracts, including the proportional adjustment of historical volume, open interest, and trade data.

The Exchange has attached a copy of the Exchange Advisory related to the aforementioned Amendments, as well as the text of the amended Rules, including all additions and deletions. *See* Attachments A and B to the Exchange Advisory (the "Advisory"), attached hereto as Attachment 1.

Conclusion

The Exchange certifies that the Amendments and Advisory comply with the Act and the regulations thereunder. Specifically, the Amendments comply with Core Principle 5 as the reportable and position accountability levels are necessary and appropriate to reduce the potential threat of market manipulation and remain unchanged in notional terms. Additionally, the scope of the Amendments is limited to the reduction in the notional value of the Contracts to $100,000. Consequently, as the Exchange has certified in previous filings with the Commission, the Contracts continue to comply with Core Principles 2, 3, 7 and 8.[3]

Additionally, the Exchange provided the Amendments and Advisory to the Exchange Practices Committee and the Regulatory Oversight Committee. There were no substantive opposing views to the Amendments and the Advisory.

The Exchange certifies that it has concurrently posted this submission on its website at http://www.erisfutures.com/rules-notices-policies.

In the event that you have questions, please contact Jeremy Liabo, Counsel, at 312-626-2686 or Jeremy.Liabo@erisfutures.com, or me at 312-626-2669 or Michael.Riddle@erisfutures.com.

Sincerely,

Michael A. Riddle Jr.

Michael A. Riddle Jr.
Acting Chief Regulatory Officer

cc: Division of Market Oversight (via DMOSubmissions@cftc.gov)

[3] *See* Letter from Stephen M. Humenik, General Counsel and Chief Regulatory Officer, Eris Exchange to Sauntia S. Warfield, Office of the Secretariat, Commodity Futures Trading Comm'n (Dec. 5, 2012) (on file with the Commission) (certifying the Eris Exchange standard interest rate swap futures product); *see also* Letter from Stephen M. Humenik, General Counsel and Chief Regulatory Officer, Eris Exchange, to David Stawick, Sec'y, Commodity Futures Trading Comm'n (Nov. 1, 2011) (certifying the Eris Exchange interest rate swap futures product).

Exchange Advisory

TO:	Eris Exchange Market Participants
FROM:	Eris Exchange Control Center and Market Regulation Department
ADVISORY:	#13-04
DATE:	May 15, 2013
SUBJECT:	Rulebook Amendments Related to the Reduction in the Notional Value of Eris Exchange Contracts from $1,000,000 to $100,000.

Background

This Exchange Advisory serves to notify Participants of Eris Exchange, LLC ("Eris Exchange" or "Exchange") that:

I. The Exchange is amending Eris Exchange Rule 533 (Position Limit, Position Accountability and Reportable Level Table) and Rule 1101 (Eris Interest Rate Swap Futures Contract Specifications) (the "Amendments").

II. The Exchange has filed a notification with the Commodity Futures Trading Commission to amend Exchange Rules 533 and 1101. **The Amendments will be effective June 3, 2013**.

The purpose of the Amendments is to facilitate the reduction in the notional value of all Eris Exchange Interest Rate Swap Futures Contracts (the "Contracts") from $1,000,000 to $100,000. The Exchange first notified Participants of its intent to reduce the notional value of the Contracts via Market Notices sent on March 18, 2013 and April 4, 2013 (the "Notices"). The Notices also contained a summary of operational changes associated with the reduction in the notional value of the Contracts, including the proportional adjustment of historical volume, open interest, and trade data.

The reportable and position accountability levels (the "Levels") for the Contracts are $300 million and $600 million notional respectively. The Amendments did not alter these Levels. However, in the interest of simplicity, the Exchange lists the Levels in Rule 533 by number of contracts. Consequently, the Exchange has amended the Position Limit and Reportable Level Table in Rule 533 to account for the decrease in the notional value of the Contracts.

Similarly, the Exchange has amended Rule 1101 to reflect the reduction in the notional value of the Contracts.

ATTACHMENT 1

The Amendments, as well as the text of the amended Rules, including all additions and deletions are set forth in Attachments A and B.

You are receiving this email as you are subscribed to Notices@erisfutures.com. If you would like to unsubscribe or if you know of someone that should be on this distribution please contact the ErisControlCenter@erisfutures.com.

ATTACHMENT A

RULE 533. Position Limit, Position Accountability and Reportable Level Table (excerpt)

Position Limit and Reportable Level Table:

Contract Name	Commodity Code	Tenor of each discrete Commodity Code	Rule	Reportable Futures Level for each discrete Commodity Code	Position Accountability for each discrete Commodity Code	Position Limit for each discrete Commodity Code
Interest Rate Swap Futures Contract	A*nnnn*	Less than or equal to 2 years	1101	3000	6000	N/A
Interest Rate Swap Futures Contract	B*nnnn*	Greater than 2 years and less than or equal to 5 years	1101	3000	6000	N/A
Interest Rate Swap Futures Contract	C*nnnn*	Greater than 5 years and less than or equal to 10 years	1101	3000	6000	N/A
Interest Rate Swap Futures Contract	D*nnnn*	Greater than 10 years	1101	3000	6000	N/A

ATTACHMENT 1

RULE 1101. Eris Interest Rate Swap Futures Contract Specifications (excerpt)

(a) Flex Contract Specifications:

Contract Structure	~~$1 million~~ $100,000 notional principal whose value is based upon the difference between a stream of semi-annual fixed interest payments and a stream of quarterly floating interest payments based on 3 month US Dollar LIBOR, over a term to maturity.
Contract Size	1 Contract = 1 lot = ~~$1 million~~ $100,000 face.
Quoting Convention – Off-Market Swap Futures	During the Spot, Forward and Seasoned periods of a given Contract, market participants can negotiate the Net Present Value (NPV) per Contract. NPV is expressed in per contract terms for the Buyer (fixed rate payer). Each Off-Market Swap Future negotiated in NPV terms has an implicit futures-style trade price of $Trade\ Price\ = 100 + A_{negotiated} + B_t - C_t$ where $A_{negotiated}$ is the NPV per Contract agreed upon between the counterparties (divided by ~~10,000~~ 1,000 to normalize units to $100 face amount), B_t is the value of the historical fixed and floating amounts, and C_t is Eris PAI™ at time t. The B and C components are calculated once daily and applied by the Exchange, and are not subject to negotiation by the counterparties. The NPV per Contract can be negotiated in the following increments/tick sizes: • ~~$10~~ $1 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is less than two years. • ~~$25~~ $2 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 2 years and less than 4 years. • ~~$50~~ $5 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 4 years and less than 7 years. • ~~$100~~ $10 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 7 years and less than 20 years. • ~~$200~~ $20 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 20 years.

ATTACHMENT 1

(b) Standard Contract Specifications

(1) 2 Year Standard Contract Specifications:

Contract Structure	~~$1 million~~ $100,000 notional principal whose value is based upon the difference between a stream of semi-annual fixed interest payments and a stream of quarterly floating interest payments based on 3 month US Dollar LIBOR, over a term to maturity.
Contract Size	1 Contract = 1 lot = ~~$1 million~~ $100,000 face
Quoting Convention	Net Present Value (NPV) per Contract will be used for trade execution. NPV is expressed in per contract terms for the Buyer (fixed rate payer). Each Swap Future negotiated in NPV terms has an implicit futures-style trade price of $Trade\ Price\ = 100 + A_{negotiated} + B_t - C_t$ where $A_{negotiated}$ is the NPV per Contract agreed upon between the counterparties (divided by ~~10,000~~ 1,000 to normalize units to $100 face amount), B_t is the value of the historical fixed and floating amounts, and C_t is Eris PAI™ at time t. The B and C components are calculated once daily and applied by the Exchange, and are not subject to negotiation by the counterparties. The NPV per Contract can be negotiated in the following increments/tick sizes: • ~~$10~~ $1 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is less than two years. • ~~$25~~ $2 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 2 years and less than 4 years.

ATTACHMENT 1

(2) 5 Year Standard Contract Specifications:

Contract Structure	~~$1 million~~ $100,000 notional principal whose value is based upon the difference between a stream of semi-annual fixed interest payments and a stream of quarterly floating interest payments based on 3 month US Dollar LIBOR, over a term to maturity.
Contract Size	1 Contract = 1 lot = ~~$1 million~~ $100,000 face
Quoting Convention	Net Present Value (NPV) per Contract will be used for trade execution. NPV is expressed in per contract terms for the Buyer (fixed rate payer). Each Swap Future negotiated in NPV terms has an implicit futures-style trade price of $Trade\ Price\ = 100 + A_{negotiated} + B_t - C_t$ where $A_{negotiated}$ is the NPV per Contract agreed upon between the counterparties (divided by ~~10,000~~ 1,000 to normalize units to $100 face amount), B_t is the value of the historical fixed and floating amounts, and C_t is Eris PAI™ at time t. The B and C components are calculated once daily and applied by the Exchange, and are not subject to negotiation by the counterparties. The NPV per Contract can be negotiated in the following increments/tick sizes: • ~~$10~~ $1 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is less than two years. • ~~$25~~ $2 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 2 years and less than 4 years. • ~~$50~~ $5 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 4 years and less than 7 years.

(3) <u>10 Year Standard Contract Specifications:</u>

Contract Structure	~~$1 million~~ $100,000 notional principal whose value is based upon the difference between a stream of semi-annual fixed interest payments and a stream of quarterly floating interest payments based on 3 month US Dollar LIBOR, over a term to maturity.
Contract Size	1 Contract = 1 lot = ~~$1 million~~ $100,000 face
Quoting Convention	Net Present Value (NPV) per Contract will be used for trade execution. NPV is expressed in per contract terms for the Buyer (fixed rate payer). Each Swap Future negotiated in NPV terms has an implicit futures-style trade price of $Trade\ Price\ = 100 + A_{negotiated} + B_t - C_t$ where $A_{negotiated}$ is the NPV per Contract agreed upon between the counterparties (divided by ~~10,000~~ 1,000 to normalize units to $100 face amount), B_t is the value of the historical fixed and floating amounts, and C_t is Eris PAI™ at time t. The B and C components are calculated once daily and applied by the Exchange, and are not subject to negotiation by the counterparties. The NPV per Contract can be negotiated in the following increments/tick sizes: • ~~$10~~ $1 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is less than two years. • ~~$25~~ $2 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 2 years and less than 4 years. • ~~$50~~ $5 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 4 years and less than 7 years. • ~~$100~~ $10 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 7 years and less than 20 years.

ATTACHMENT 1

(4) 30 Year Standard Contract Specifications:

Contract Structure	~~$1 million~~ $100,000 notional principal whose value is based upon the difference between a stream of semi-annual fixed interest payments and a stream of quarterly floating interest payments based on 3 month US Dollar LIBOR, over a term to maturity.
Contract Size	1 Contract = 1 lot = ~~$1 million~~ $100,000 face
Quoting Convention	Net Present Value (NPV) per Contract will be used for trade execution. NPV is expressed in per contract terms for the Buyer (fixed rate payer). Each Swap Future negotiated in NPV terms has an implicit futures-style trade price of $Trade\ Price\ = 100 + A_{negotiated} + B_t - C_t$ where $A_{negotiated}$ is the NPV per Contract agreed upon between the counterparties (divided by ~~10,000~~ 1,000 to normalize units to $100 face amount), B_t is the value of the historical fixed and floating amounts, and C_t is Eris PAI™ at time t. The B and C components are calculated once daily and applied by the Exchange, and are not subject to negotiation by the counterparties. The NPV per Contract can be negotiated in the following increments/tick sizes: • ~~$10~~ $1 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is less than two years. • ~~$25~~ $2 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 2 years and less than 4 years. • ~~$50~~ $5 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 4 years and less than 7 years. • ~~$100~~ $10 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 7 years and less than 20 years. • ~~$200~~ $20 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 20 years.

ATTACHMENT 1

ATTACHMENT B

RULE 533. Position Limit, Position Accountability and Reportable Level Table (excerpt)

Position Limit and Reportable Level Table:

Contract Name	Commodity Code	Tenor of each discrete Commodity Code	Rule	Reportable Futures Level for each discrete Commodity Code	Position Accountability for each discrete Commodity Code	Position Limit for each discrete Commodity Code
Interest Rate Swap Futures Contract	A*nnnn*	Less than or equal to 2 years	1101	3000	6000	N/A
Interest Rate Swap Futures Contract	B*nnnn*	Greater than 2 years and less than or equal to 5 years	1101	3000	6000	N/A
Interest Rate Swap Futures Contract	C*nnnn*	Greater than 5 years and less than or equal to 10 years	1101	3000	6000	N/A
Interest Rate Swap Futures Contract	D*nnnn*	Greater than 10 years	1101	3000	6000	N/A

ATTACHMENT 1

RULE 1101. Eris Interest Rate Swap Futures Contract Specifications (excerpt)

(a) Flex Contract Specifications:

Contract Structure	$100,000 notional principal whose value is based upon the difference between a stream of semi-annual fixed interest payments and a stream of quarterly floating interest payments based on 3 month US Dollar LIBOR, over a term to maturity.
Contract Size	1 Contract = 1 lot = $100,000 face.
Quoting Convention – Off-Market Swap Futures	During the Spot, Forward and Seasoned periods of a given Contract, market participants can negotiate the Net Present Value (NPV) per Contract. NPV is expressed in per contract terms for the Buyer (fixed rate payer). Each Off-Market Swap Future negotiated in NPV terms has an implicit futures-style trade price of $Trade\ Price\ = 100 + A_{negotiated} + B_t - C_t$ where $A_{negotiated}$ is the NPV per Contract agreed upon between the counterparties (divided by 1,000 to normalize units to $100 face amount), B_t is the value of the historical fixed and floating amounts, and C_t is Eris PAI™ at time t. The B and C components are calculated once daily and applied by the Exchange, and are not subject to negotiation by the counterparties. The NPV per Contract can be negotiated in the following increments/tick sizes: • $1 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is less than two years. • $2 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 2 years and less than 4 years. • $5 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 4 years and less than 7 years. • $10 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 7 years and less than 20 years. • $20 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 20 years.

(b) Standard Contract Specifications

(1) <u>2 Year Standard Contract Specifications:</u>

Contract Structure	\$100,000 notional principal whose value is based upon the difference between a stream of semi-annual fixed interest payments and a stream of quarterly floating interest payments based on 3 month US Dollar LIBOR, over a term to maturity.
Contract Size	1 Contract = 1 lot = \$100,000 face
Quoting Convention	Net Present Value (NPV) per Contract will be used for trade execution. NPV is expressed in per contract terms for the Buyer (fixed rate payer). Each Swap Future negotiated in NPV terms has an implicit futures-style trade price of $Trade\ Price\ = 100 + A_{negotiated} + B_t - C_t$ where $A_{negotiated}$ is the NPV per Contract agreed upon between the counterparties (divided by 1,000 to normalize units to \$100 face amount), B_t is the value of the historical fixed and floating amounts, and C_t is Eris PAI™ at time t. The B and C components are calculated once daily and applied by the Exchange, and are not subject to negotiation by the counterparties. The NPV per Contract can be negotiated in the following increments/tick sizes: • \$1 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is less than 2 years. • \$2 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 2 years and less than 4 years.

ATTACHMENT 1

(2) 5 Year Standard Contract Specifications:

Contract Structure	\$100,000 notional principal whose value is based upon the difference between a stream of semi-annual fixed interest payments and a stream of quarterly floating interest payments based on 3 month US Dollar LIBOR, over a term to maturity.
Contract Size	1 Contract = 1 lot = \$100,000 face
Quoting Convention	Net Present Value (NPV) per Contract will be used for trade execution. NPV is expressed in per contract terms for the Buyer (fixed rate payer). Each Swap Future negotiated in NPV terms has an implicit futures-style trade price of $Trade\ Price\ = 100 + A_{negotiated} + B_t - C_t$ where $A_{negotiated}$ is the NPV per Contract agreed upon between the counterparties (divided by 1,000 to normalize units to \$100 face amount), B_t is the value of the historical fixed and floating amounts, and C_t is Eris PAI™ at time t. The B and C components are calculated once daily and applied by the Exchange, and are not subject to negotiation by the counterparties. The NPV per Contract can be negotiated in the following increments/tick sizes: • \$1 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is less than 2 years. • \$2 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 2 years and less than 4 years. • \$5 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 4 years and less than 7 years.

(3) <u>10 Year Standard Contract Specifications:</u>

Contract Structure	\$100,000 notional principal whose value is based upon the difference between a stream of semi-annual fixed interest payments and a stream of quarterly floating interest payments based on 3 month US Dollar LIBOR, over a term to maturity.
Contract Size	1 Contract = 1 lot = \$100,000 face
Quoting Convention	Net Present Value (NPV) per Contract will be used for trade execution. NPV is expressed in per contract terms for the Buyer (fixed rate payer). Each Swap Future negotiated in NPV terms has an implicit futures-style trade price of $Trade\ Price\ = 100 + A_{negotiated} + B_t - C_t$ where $A_{negotiated}$ is the NPV per Contract agreed upon between the counterparties (divided by 1,000 to normalize units to \$100 face amount), B_t is the value of the historical fixed and floating amounts, and C_t is Eris PAI™ at time t. The B and C components are calculated once daily and applied by the Exchange, and are not subject to negotiation by the counterparties. The NPV per Contract can be negotiated in the following increments/tick sizes: • \$1 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is less than 2 years. • \$2 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 2 years and less than 4 years. • \$5 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than greater than or equal 4 years and less than 7 years. • \$10 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than greater than or equal 7 years and less than 20 years.

(4) <u>30 Year Standard Contract Specifications:</u>

Contract Structure	$100,000 notional principal whose value is based upon the difference between a stream of semi-annual fixed interest payments and a stream of quarterly floating interest payments based on 3 month US Dollar LIBOR, over a term to maturity.
Contract Size	1 Contract = 1 lot = $100,000 face
Quoting Convention	Net Present Value (NPV) per Contract will be used for trade execution. NPV is expressed in per contract terms for the Buyer (fixed rate payer). Each Swap Future negotiated in NPV terms has an implicit futures-style trade price of $Trade\ Price\ = 100 + A_{negotiated} + B_t - C_t$ where $A_{negotiated}$ is the NPV per Contract agreed upon between the counterparties (divided by 1,000 to normalize units to $100 face amount), B_t is the value of the historical fixed and floating amounts, and C_t is Eris PAI™ at time t. The B and C components are calculated once daily and applied by the Exchange, and are not subject to negotiation by the counterparties. The NPV per Contract can be negotiated in the following increments/tick sizes: • $1 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is less than 2 years. • $2 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 2 years and less than 4 years. • $5 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 4 years and less than 7 years. • $10 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 7 years and less than 20 years. • $20 for Contracts where the lesser of Remaining Tenor/Underlying Tenor is greater than or equal to 20 years.