



RECEIVED
CFTC

2011 MAY 24 AM 10: 21

May 23, 2011

OFFICE OF THE
SECRETARIAT

Mr. David Stawick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

**RE: Amendments to CBOT Rulebook Chapter 22A on 30-Day Federal Funds Options to permit the listing of 3-Month, 6-Month, 9-Month, and 1-Year Mid-Curve options on Fed Funds futures
CBOT Submission No. 11-204**

Dear Mr. Stawick:

Pursuant to Commission Regulation 40.6 and Section 5c(c)(1) of the Commodity Exchange Act, the Chicago Board of Trade, Inc. ("CBOT" or "Exchange") hereby certifies amendments to Exchange Rules 22A01.G., 22A01.I., and 22A02.A., which govern, respectively, the nature of options on 30-Day Federal Fund Futures, and the termination of trading in and the exercise of such options. The Exchange certifies that these changes do not violate the Act or the Commission's regulations.

By this letter, the CBOT seeks to expand its current product offerings of Fed Funds options. Specifically, the Exchange intends to list monthly 6-Month and 1-Year Fed Funds Mid-Curve options on **Monday, June 20, 2011**. At launch, the Exchange will list three 6-Month Fed Funds Mid-Curve options with July, August, and September 2011 expiries that will exercise into the January, February, and March 2012 Fed Funds futures contracts, respectively, and three 1-Year Fed Funds Mid-Curve options with July, August, and September 2011 expiries that will exercise into the July, August, and September 2012 Fed Funds futures contracts, respectively.

The new 6-Month and 1-Year Fed Funds Mid-Curve options will be listed for trading on CME Globex (Sunday-Friday, 5:30 p.m. - 4:00 p.m., Chicago time) and in open outcry (Monday-Friday, 7:20 a.m. -2:00 p.m., CT).

Furthermore, the CBOT is certifying rule changes that enable the Exchange to list monthly 3-Month and 9-Month Fed Funds Mid-Curve options. This ensures that the Exchange will maintain the flexibility to list such Mid-Curve options, at its discretion, in the future.

The new Fed Funds Mid-Curve options are largely identical in design to existing Standard options on Fed Fund futures, with four exceptions:

- ***Fed Funds Mid-Curve options are short-dated options on deferred Fed Funds futures.*** Mid-curve options will exercise into Fed Funds futures for delivery three, six, nine, or 12 months after the month in which the Mid-Curve option expires. Standard Fed Funds options, by comparison, expire simultaneously with their underlying reference Fed Funds futures.
- ***Each Fed Funds Mid-Curve option will expire at 7:00 p.m., Chicago time, on the last trading day of its expiration month, with reference to the daily settlement price of its underlying reference Fed Funds futures contract.*** At option expiration, CME Clearing will automatically exercise all in-the-money Mid-Curve options into the corresponding Fed Funds futures, on the basis of the futures contract's daily settlement price for that day (as typically determined at the close of open outcry trading at 2:00 p.m. Chicago time). In keeping with other CME Group interest rate options, Fed Funds Mid-Curve options will continue to trade until the conclusion of that day's Globex trading session. Each Standard Fed Funds option, by comparison, expires at 7:00 p.m., CT, on the business day following its last trading day, simultaneously with the final cash settlement of its underlying reference Fed Funds futures contract.
- ***Fed Funds Mid-Curve options will not be eligible for contrary exercise instructions.*** Unlike options listed on the Exchange's other interest rate futures, Fed Funds Mid-Curve options will not permit long position holders to give contrary instructions for option exercise. CME Clearing will automatically exercise all in-the-money Fed Funds Mid-Curve options following expiration on their last trading day and will abandon all out-of-the-money Fed Funds Mid-Curve options. (In keeping with CME Group conventions, at-the-money options will be considered out-of-the-money.) The reason for this exception is that, unlike the Exchange's other interest rate option products, Fed Funds Mid-Curve options will not be guaranteed to expire on Fridays. Depending on the configuration of the calendar, last trading and expiration days for these options could occur on any weekday. If these options were eligible for contrary instructions, holders of short positions would find themselves exposed to pin risk. Even though the underlying futures market was open for trading, a short position holder would not know for certain whether he were or were not going to receive an exercise. Making Fed Funds Mid-Curve options ineligible for contrary instructions removes such pin risk.
- ***Fed Funds Mid-Curve options will have a reportable position level of 25 contracts.*** By establishing a lower reportable position threshold of 25 contracts, Fed Funds Mid-Curve options will have a large trader position level that is consistent with existing exchange practice with respect to Eurodollar mid-curve options. Standard Fed Funds options, by contrast, have a reportable position level of 600 contracts.

Mr. David Stawick
May 23, 2011
Page 3

Otherwise, Fed Funds Mid-Curve options are identical to Standard Fed Funds options in terms of option premium basis, strike price increments and arrays, last trading day, exercise procedures, and trading hours.

Similar to the relationship between mid-curve options versus standard options on 3-Month Eurodollar futures, Fed Funds Mid-Curve options are considered to be a product extension of the Fed Funds option suite and not a new product. Thus position accountability, block trade and all-or-none minimum thresholds, and non-reviewable trading ranges (i.e., "no bust ranges") for Fed Funds Mid-Curve options will be defined by the same terms and conditions as currently apply to Standard Fed Funds options.

Attachment 1 summarizes the proposed amendments to CBOT Rules 22A01.G., 22A01.I., and 22A02.A.

Attachment 2 highlights the salient features of the new 6-Month and 1-Year Fed Funds Mid-Curve options.

Attachment 3 provides a clean version of CBOT Rulebook Chapter 22A on Fed Funds Options.

Attachment 4 provides an amended version of Table 5.C. on CBOT position limit and reportable levels to reflect the addition of Fed Funds Mid-Curve options.

Please direct inquiries regarding this submission to Daniel Grombacher at 312.634.1583, daniel.grombacher@cmegroup.com or me at 312.466.7478. Please reference CBOT Submission No.11-204 in any related correspondence.

Sincerely,

/s/Timothy Elliott
Director and Associate General Counsel

Attachments

Attachment 1

Proposed Changes to CBOT Rulebook Chapter 22A on Standard Options on 30-Day Federal Funds Futures

(Additions are underlined; deletions are ~~struck through~~.)

22A01.G. Nature of Options on 30-Day Fed Fund Futures

The buyer of one 30-Day Fed Fund put option may exercise his option at any time prior to expiration (subject to Rule 22A02.A.) to assume a short position of one 30-Day Fed Fund futures contract of a specified contract month at a strike price set at the time the option was purchased. The seller of one 30-Day Fed Fund futures put option incurs the obligation of assuming a long position of one 30-Day Fed Fund futures contract of a specified contract month at a striking price set at the time the option was sold, upon exercise by a put option buyer.

The buyer of one 30-Day Fed Fund futures call option may exercise his option at any time prior to expiration (subject to Rule 22A02.A) to assume a long position in one 30-Day Fed Fund futures contract of a specified contract month at a strike price set at the time the option was purchased. The seller of one 30-Day Fed Fund futures call option incurs the obligation of assuming a short position in one 30-Day Fed Fund futures contract of a specified contract month at a striking price set at the time the option was sold, upon exercise by a call option buyer.

1. Standard Options

Any Standard option shall be exercisable into one 30-Day Fed Fund futures contract for delivery in the same month as such option's expiration month.

2. Mid-Curve Options

3-Month Mid-Curve Options

Any 3-Month Mid-Curve option shall be exercisable into one 30-Day Fed Fund futures contract for delivery three calendar months following such option's expiration month.

6-Month Mid-Curve Options

Any 6-Month Mid-Curve option shall be exercisable into one 30-Day Fed Fund futures contract for delivery six calendar months following such option's expiration month.

9-Month Mid-Curve Options

Any 9-Month Mid-Curve option shall be exercisable into one 30-Day Fed Fund futures contract for delivery nine calendar months following such option's expiration month.

1-Year Mid-Curve Options

Any 1-Year Mid-Curve option shall be exercisable into one 30-Day Fed Fund futures contract for delivery twelve calendar months following such option's expiration month.

Attachment 1 (Continued)

22A01.I. Termination of Trading

1. Standard Options

~~Trading in an expiring Standard options 30-Day Fed Fund futures option shall terminate on the same date and at the same time as the termination of trading in the corresponding futures (Rule 22102.F.).~~

2. Mid-Curve Options

Trading in any expiring 3-month, 6-month, 9-month, or 1-Year Mid-Curve option shall terminate on the last business day of such option's expiration month. Trading in such Mid-Curve option shall terminate at the same time as that day's close of trading in the corresponding futures contract.

22A02.A. Exercise of Option

1. Standard Options

The buyer of a Standard option on 30-Day Fed Fund futures may exercise the option on any business day up to and including the day such option expires by giving notice of exercise to the Clearing House by 6:00 p.m. Chicago time, or by such other time designated by the Exchange, on such day.

Notwithstanding the aforementioned provisions, all in-the-money options that have not been liquidated or exercised on the last day of trading shall be automatically exercised after 6:00 p.m. on the business day following the last day of trading, or such time designated by the Exchange, unless notice to cancel automatic exercise is given to the Clearing House. Notice to cancel automatic exercise shall be given to the Clearing House by 6:00 p.m. on the business day following the last day of trading, or by such other time designated by the Exchange.

An option is in-the-money if the final settlement price of the underlying futures contract is less in the case of a put, or greater in the case of a call, than the exercise price of the option.

Unexercised 30-Day Fed Fund futures options shall expire at 7:00 p.m. Chicago time on the next business day after the termination of trading.

2. Mid-Curve Options

The buyer of a Mid-Curve option on 30-Day Fed Fund futures may exercise such option on any day of trading, except on the day such option expires, by giving notice of exercise to the Clearing House by 6:00 p.m. Chicago time, or by such other time designated by the Exchange, on such day.

All mid-curve options that are in-the-money and have not been liquidated or exercised prior to the termination of trading shall be exercised automatically.

A mid-curve option is in-the-money if the daily settlement price of the underlying futures contract is less in the case of a put, or greater in the case of a call, than the exercise price of the mid-curve option.

Any Mid-Curve option that is out-of-the-money and has not been liquidated or exercised prior to its termination of trading shall expire at 7:00 p.m. Chicago time on its last day of trading (Rule 22A01.I.2.).

Attachment 2

Salient Features 6-Month and 1-Year Mid-Curve Options on 30-Day Federal Funds Futures

Underlying Instrument	One Fed Funds futures contract of a specified delivery month following the option expiry month. For example, 6-Month Mid-Curve options expiring in January, February, and March would reference Fed Funds futures for delivery six months after the month in which the option expires (i.e., July, August, and September, respectively). 1-Year Mid-Curve options expiring in January, February, and March would reference Fed Funds futures for delivery twelve months after the month in which the option expires (i.e., April, May, and June of the following year, respectively).
Option Premium Increments*	One-quarter of one basis point (0.0025), or \$10.4175 per contract. For cabinet transactions only, minimum option premium increment is \$1.00 over a range of \$1.00 to \$10.00 per option contract.
Strike Prices*	Strike prices will be listed in increments of 6.25 basis points (0.0625) and 12.5 basis points (0.1250). The following strike prices in increments of 6.25 basis points will be listed: the at-the-money strike price closest to the current futures price plus the next ten consecutive higher and the next ten consecutive lower strike prices. Above and below this band, the following strike prices in increments of 12.5 basis points shall be listed: the next five (5) consecutive higher and the next five (5) consecutive lower strike prices.
Option Expiry Months	Three consecutive monthly expiries will be listed at a time.
Last Trading Day*	Last business day of the option expiration month. Trading in expiring options ceases at the close of the regular CME Globex trading session for the corresponding futures contract.
Exercise	American-style. The buyer of an option may exercise the option on any business day prior to the expiration date by giving notice to CME Clearing by 6:00 p.m., Chicago time. On the option's expiration date, no contrary option exercise instructions are permitted and no early exercise instructions are permitted. All in-the-money options shall be automatically exercised and all out-of-the-money options shall be abandoned by CME Clearing on the day of expiration for the option. At-the-money options will be considered out-of-the-money.
Expiration	Unexercised options shall expire at 7:00 p.m., Chicago time, on their last trading day.
Trading Hours*	Globex: 5:30 p.m. to 4:00 p.m., Chicago time, Sunday – Friday. Open Outcry: 7:20 a.m. to 2:00 p.m., Chicago time, Monday – Friday.
Ticker Symbols	6-Month Mid-Curves: ZQ6 for Globex and FF6 for open auction. 1-Year Mid-Curves: ZQ1 for Globex and FF1 for open auction.
Daily Price Limits*	None
Position Accountability*	3,000 net futures-equivalent contracts.
Reportable Level	25 option contracts
Block Trade Minimum*	Regular Trading Hours (7:00 a.m. to 4:00 p.m., Chicago time): 1,500 contracts European Trading Hours (12:00 a.m. to 7:00 a.m., Chicago time): 750 contracts Asian Trading Hours (4:00 p.m. to 12:00 a.m., Chicago time): 375 contracts Intra-commodity calendar spreads are prohibited. Inter-commodity spreads are permitted provided that the quantity of each leg of the spread meets the larger of the threshold requirements for the underlying futures during RTH, ETH, or ATH.
All-or-None Minimum*	2,000 contracts on an outright basis and 2,000 contracts per leg for inter- and intra-market spreads. Counterparty minimum of 10% of order.
Non-Reviewable Trading Ranges*	Bid/Ask reasonability is 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 2 basis points. 20% of the premium up to one-quarter of the underlying futures non-reviewable range.

*Identical to existing standard Fed Funds options.

Attachment 3

Chapter 22A Standard Options on 30-Day Federal Funds Futures

22A00. SCOPE OF CHAPTER

This chapter is limited in application to put and call options on 30-Day Fed Fund futures. In addition to the rules of this chapter, transactions in options on 30-Day Fed Fund futures shall be subject to the general rules of the Exchange insofar as applicable.

22A01. OPTIONS CHARACTERISTICS

22A01.A. Contract Months

Trading in 30-Day Fed Fund futures options may be scheduled in such months as determined by the Exchange.

22A01.B. Trading Unit

One 30-Day Fed Fund futures contract of a specified contract month.

22A01.C. Minimum Fluctuations

The premium for 30-Day Fed Fund futures options shall be in multiples of one-quarter of one basis point or ten dollars and forty-one and three-quarters cents (\$10.4175) per quarter basis point per contract. One full basis point shall equal forty-one dollars and sixty-seven cents (\$41.67) per contract.

However, a position may be initiated or liquidated in 30-Day Fed Fund futures options at a premium ranging from \$1.00 to \$10.00, in \$1.00 increments per option contract.

22A01.D. Trading Hours

The hours of trading for options on 30-Day Fed Fund futures contracts shall be determined by the Exchange. Options shall be opened and closed for all months and strike prices simultaneously or in such other manner as determined by the Exchange.

On its last day of trading, an expiring 30-Day Fed Fund futures option shall cease trading at the same time as the close of trading for the corresponding futures contract on that trading day.

22A01.E. Exercise Prices

Trading shall be conducted for put and call options with strike prices in multiples of six and one-quarter basis points (0.0625) per 30-Day Fed Fund futures contract and in multiples of twelve and one-half basis points (0.1250) per 30-Day Fed Fund futures contract as follows:

1. At the commencement of trading for such option contracts, the following strike prices in multiples of six and one-quarter basis points shall be listed: one with a strike price closest to the previous day's settlement price on the underlying 30-Day Fed Fund futures contract and the next ten (10) consecutive higher and the next ten (10) consecutive lower strike prices closest to the previous day's settlement price. If a previous day's settlement price is midway between two strike prices, the closest price shall be the larger of the two. Over time, new striking prices will be added to ensure that at least ten 6-1/4 basis point striking prices always exist above and below the previous day's settlement price in the underlying futures.

2. At the commencement of trading for such option contracts, the following strike prices in multiples of twelve and one-half basis points shall be listed: the next five (5) consecutive higher and the next five (5) consecutive lower strike prices above and below the strike price band as stipulated in Rule 22A01.E.1. Over time, new striking prices will be added to ensure that at least five 12-1/2 basis point striking prices always exist above and below the strike price band as stipulated in Rule 22A01.E.1.

Attachment 3 (Continued)

3. When a new strike price is added for an option contract month, the same strike price will be added to all option contract months for which that strike price is not already listed. All new strike prices will be added prior to the opening of trading on the following business day. The Exchange may modify the procedure for the introduction of strike prices as it deems appropriate in order to respond to market conditions.

22A01.F. Reserved

22A01.G. Nature of Options on 30-Day Fed Fund Futures

The buyer of one 30-Day Fed Fund put option may exercise his option at any time prior to expiration (subject to Rule 22A02.A.) to assume a short position of one 30-Day Fed Fund futures contract of a specified contract month at a strike price set at the time the option was purchased. The seller of one 30-Day Fed Fund futures put option incurs the obligation of assuming a long position of one 30-Day Fed Fund futures contract of a specified contract month at a striking price set at the time the option was sold, upon exercise by a put option buyer.

The buyer of one 30-Day Fed Fund futures call option may exercise his option at any time prior to expiration (subject to Rule 22A02.A) to assume a long position in one 30-Day Fed Fund futures contract of a specified contract month at a strike price set at the time the option was purchased. The seller of one 30-Day Fed Fund futures call option incurs the obligation of assuming a short position in one 30-Day Fed Fund futures contract of a specified contract month at a striking price set at the time the option was sold, upon exercise by a call option buyer.

1. Standard Options

Any Standard option shall be exercisable into one 30-Day Fed Fund futures contract for delivery in the same month as such option's expiration month.

2. Mid-Curve Options

3-Month Mid-Curve Options

Any 3-Month Mid-Curve option shall be exercisable into one 30-Day Fed Fund futures contract for delivery three calendar months following such option's expiration month.

6-Month Mid-Curve Options

Any 6-Month Mid-Curve option shall be exercisable into one 30-Day Fed Fund futures contract for delivery six calendar months following such option's expiration month.

9-Month Mid-Curve Options

Any 9-Month Mid-Curve option shall be exercisable into one 30-Day Fed Fund futures contract for delivery nine calendar months following such option's expiration month.

1-Year Mid-Curve Options

Any 1-Year Mid-Curve option shall be exercisable into one 30-Day Fed Fund futures contract for delivery twelve calendar months following such option's expiration month.

Attachment 3 (Continued)

22A01.H. Reserved

22A01.I. Termination of Trading

1. Standard Options

Trading in expiring Standard options shall terminate on the same date and at the same time as the termination of trading in the corresponding futures (Rule 22102.F.).

2. Mid-Curve Options

Trading in any expiring 3-month, 6-month, 9-month, or 1-Year Mid-Curve option shall terminate on the last business day of such option's expiration month. Trading in such Mid-Curve option shall terminate at the same time as that day's close of trading in the corresponding futures contract.

22A01.J. Contract Modification

Specifications shall be fixed as of the first day of trading of a contract except that all options must conform to government rules in force at the time of exercise. If the U.S. government, an agency, or duly constituted body thereof issues an order, ruling, directive, or law inconsistent with these rules, such order, ruling, directive, or law shall be construed to become part of the rules and all open and new options contracts shall be subject to such government orders.

22A02. EXERCISE AND ASSIGNMENT

In addition to the applicable procedures and requirements of Chapter 7, the following shall apply to the exercise and assignment of put and call options on 30-Day Fed Fund futures.

22A02.A. Exercise of Option

1. Standard Options

The buyer of a Standard option on 30-Day Fed Fund futures may exercise the option on any business day up to and including the day such option expires by giving notice of exercise to the Clearing House by 6:00 p.m. Chicago time, or by such other time designated by the Exchange, on such day.

Notwithstanding the aforementioned provisions, all in-the-money options that have not been liquidated or exercised on the last day of trading shall be automatically exercised after 6:00 p.m. on the business day following the last day of trading, or such time designated by the Exchange, unless notice to cancel automatic exercise is given to the Clearing House. Notice to cancel automatic exercise shall be given to the Clearing House by 6:00 p.m. on the business day following the last day of trading, or by such other time designated by the Exchange.

An option is in-the-money if the final settlement price of the underlying futures contract is less in the case of a put, or greater in the case of a call, than the exercise price of the option.

Unexercised 30-Day Fed Fund futures options shall expire at 7:00 p.m. Chicago time on the next business day after the termination of trading.

2. Mid-Curve Options

The buyer of a Mid-Curve option on 30-Day Fed Fund futures may exercise such option on any day of trading, except on the day such option expires, by giving notice of exercise to the Clearing House by 6:00 p.m. Chicago time, or by such other time designated by the Exchange, on such day.

Attachment 3 (Continued)

All mid-curve options that are in-the-money and have not been liquidated or exercised prior to the termination of trading shall be exercised automatically.

A mid-curve option is in-the-money if the daily settlement price of the underlying futures contract is less in the case of a put, or greater in the case of a call, than the exercise price of the mid-curve option.

Any Mid-Curve option that is out-of-the-money and has not been liquidated or exercised prior to its termination of trading shall expire at 7:00 p.m. Chicago time on its last day of trading (Rule 22A01.1.2.).

22A02.B. Assignment

Exercise notices accepted by the Clearing House shall be assigned through a process of random selection to clearing members' 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.

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 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.

22A03. ACTS OF GOVERNMENT, ACTS OF GOD AND OTHER EMERGENCIES

(Refer to Rule 701.).

22A04. CORRECTIONS TO OPTIONS EXERCISES

Corrections to option exercises, including automatic exercises, may be accepted by the Clearing House after the 6:00 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.

22A05. PAYMENT OF OPTION PREMIUM

The option premium must be paid in full by each clearing member to the Clearing House and by each option customer to his futures commission merchant at the time that the option is purchased, or within a reasonable time after the option is purchased.

Attachment 4

Proposed Changes to Table 5.C. on CBOT Position Limit and Reportable Levels

(Additions are underlined; deletions are ~~struck through~~.)

CONTRACT NAME	Opts	SCALE-DOWN SPOT MONTH	SPOT ^[a] MONTH	SINGLE ^[b] MONTH	ALL ^[c] MONTHS COMBINED	POSITION ACCOUNTABILITY ^[d] Futures/Options ^[d]	REPORTABLE FUTURES LEVEL	REPORTABLE OPTIONS LEVEL
FINANCIALS								
Long-Term U.S. Treasury Bonds	Y	(see #13)				10,000/25,000	1,500	1,500
U.S. Treasury Bonds	Y	(see #13)				10,000/25,000	1,500	1,500
U.S. Treasury Notes (2 yr.)	Y	(see #13)				7,500 / 20,000	1,000	1,000
U.S. Treasury Notes (3 yr.)		(see #13)				7,500 / N/A	750	
U.S. Treasury Notes (5 yr.)	Y	(see #13)				7,500 / 20,000	2,000	2,000
U.S. Treasury Notes (6 ½ - 10 yr.)	Y	(see #13)				7,500 / 20,000	2,000	2,000
On-the-Run Treasury Yield (2 yr.)						7,500 / N/A	25	
On-the-Run Treasury Yield (5 yr.)						7,500 / N/A	25	
On-the-Run Treasury Yield (10 yr.)						7,500 / N/A	25	
30 Day Fed Fund	Y					3,000 (e) / 3,000 (e) / N/A	600	600
30 Day Fed Fund Mid-Curve Options	Y					3,000 (e)		25

[a] Net long or short effective at the close of trading two business days prior to the first trading day of the delivery month.

[b] Futures-equivalent position limit net long or net short in any one month other than the spot month. Net equivalent futures long or short in all months and strike prices combined.

[c] Futures-equivalent position limit net long or net short in all months and strike prices combined. Long futures contracts, long call options, and short put options are considered to be on the long side of the market, while short futures contracts, long put options, and short call options are considered to be on the short side of the market.

[d] As described in Rule 560. Futures levels refer to futures equivalent contracts. Options levels refer to option contracts for all months and all strike prices combined in each option category (long call, long put, short call and short put).

[e] Net Futures Equivalent Positions are combined across 30 Day Fed Fund futures, standard options on 30 Day Fed Fund futures, and mid-curve options on 30 Day Fed Fund futures to determine Position Accountability.