



Via Electronic Mail to submissions@cftc.gov and dmosubmissions@cftc.gov

November 12, 2013

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

Re: Appointment of Two Directors to OneChicago, LLC's Board of Directors

Dear Ms. Jurgens:

Pursuant to section 5c(c)(1) of the Commodity Exchange Act, as amended (the "Act"), and § 40.6 and § 1.64 of the regulations promulgated by the Commodity Futures Trading Commission ("CFTC" or the "Commission") under the Act, submitted herewith is notification that two appointments have been made to OneChicago, LLC's ("OneChicago" or "OCX") board of directors ("Board") pursuant to OCX Rule 207.

On October 24, 2013, CME Group Inc. ("CME"), a Voting Owner¹ of OneChicago, appointed Ms. Jennifer Hurder as one of its two Directors to OneChicago's Board. Previously, Ms. Ann Shuman had served as CME's appointee to OneChicago's Board. Additionally, on June 30, 2013, CBOE, LLC ("CBOE"), a Voting Owner of OneChicago, appointed Mr. Andy Lowenthal as its one Director to OneChicago's Board. Previously, Mr. Richard DuFour had served as CBOE's appointee to OneChicago's Board.

Section 1.64(d) of the Commission's regulations require that each self-regulatory organization submit to the Commission within thirty days after each governing board election a list of the governing board's members and the membership interests they represent. The following is a list of OneChicago's Board and the membership interests they represent:

1. Mr. Thomas Peterffy, representing Interactive Brokers Group LLC ("IB");
2. Mr. David M. Battan, representing IB;

¹ The term "Voting Owner" is used as defined in the Second Amended and Restated Operating Agreement of OneChicago, LLC.

3. Mr. Scot Warren, representing CME;
4. Ms. Jennifer Hurder, representing CME;
5. Mr. Andy Lowenthal, representing CBOE;
6. Mr. Eric Wolff, Public Director;
7. Mr. William F. Pridmore, Public Director; and
8. Dr. Andrew Clearfield, Public Director.

Section 1.64(d) also requires self-regulatory organizations to submit to the Commission a description of how the composition of the governing board meets the requirements of § 1.64(b). Pursuant to § 1.64(b) of the Commission's regulations, each self-regulatory organization must maintain in effect standards and procedures with respect to its governing board that ensure:

- (1) That twenty percent or more of the regular voting members of the board are persons who: (i) Are knowledgeable of futures trading or financial regulation or are otherwise capable of contributing to governing board deliberations; and, (ii) (A) Are not members of the self-regulatory organization, (B) Are not currently salaried employees of the self-regulatory organization, (C) Are not primarily performing services for the self-regulatory organization in a capacity other than as a member of the self-regulatory organization's governing board, or (D) Are not officers, principals or employees of a firm which holds a membership at the self-regulatory organization either in its own name or through an employee on behalf of the firm;
- (2) In the case of a contract market, that ten percent or more of the regular voting members of the governing board be comprised where applicable of persons representing farmers, producers, merchants or exporters of principal commodities underlying a commodity futures or commodity option traded on the contract market; and
- (3) That the board's membership includes a diversity of membership interests. The self-regulatory organization must be able to demonstrate that the board membership fairly represents the diversity of interests at such self-regulatory organization and is otherwise consistent with this regulation's composition requirements;

All three of OneChicago's regular voting members of the Board that are also not employees of a firm which holds a membership at OCX meet the requirements of § 1.64(b)(1)(i). Specifically, Scot Warren, Jennifer Hurder, and Andy Lowenthal are all knowledgeable of futures trading or financial regulation or are otherwise capable of contributing to governing board deliberations.

Section 1.64(b)(2) is not applicable to OneChicago as no commodity futures are traded on the exchange.

The composition of OneChicago's Board satisfies the requirements of § 1.64(b)(3) in that the board's membership fairly represents the diversity of interests at OneChicago and is otherwise consistent with the composition requirements of § 1.64. The Board members appointed by IB, an OCX market-maker and broker-dealer granting customer access to OCX, represent the interests of other firms trading on OneChicago and customers accessing the exchange through firms like IB. The Board members appointed by CME and CBOE represent the interests of the exchange community, and, in particular, those exchanges on which equity futures and equity options are traded.

Moreover, OneChicago's Public Directors further represent the diversity of interests of OneChicago's market participants. Mr. Eric Wolff brings decades of experience in market regulation in the futures industry and assists the exchange with matters related to market regulation, compliance, and similar affairs. Mr. William F. Pridmore brings the perspective of the securities lending community, a field that OneChicago is migrating toward with its Exchange of Future for Physical transaction, which is the economic equivalent of a securities lending transaction. Similarly, Dr. Andrew Clearfield, a consultant to institutional investors, brings the perspective of the end-users of OneChicago's products.

OneChicago submits this filing pursuant to Commission regulation § 1.64(d). OneChicago is not proposing any new rules or rule amendments in this filing. There is no operational impact related to the appointments of Ms. Jennifer Hurder and Mr. Andy Lowenthal. Comments on the appointments have not been solicited and none have been received. OneChicago certifies that the appointments described above comply with the Act, including the core principles, and the Commission's regulations promulgated thereunder. OneChicago further certifies that a copy of this submission has been posted on the OneChicago website located at http://www.onechicago.com/?page_id=8917.

If you have any questions or comments related to this filing, please feel free to contact me by telephone at (312) 424-8524 or through e-mail at wbarazi@onechicago.com.

Respectfully Submitted,



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