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Christopher Bowen  
Managing Director and Chief Regulatory Counsel  
Legal Department

OFFICE OF THE  
SECRETARIAT

November 28, 2011

**VIA E-MAIL**

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

**RE: CME Non-Member Globex Fee Discount Program for FX Options  
CME Submission No. 11-449**

Dear Mr. Stawick:

Chicago Mercantile Exchange, Inc ("CME" or the "Exchange") hereby notifies the Commodity Futures Trading Commission ("Commission") that it plans to implement a non-member fee discount for Foreign Exchange ("FX") Options traded on the Globex® platform ("Program"). The proposed Program will become effective on December 13, 2011.

Exhibit 1 sets forth the terms of the proposed Program.

CME business staff responsible for the Program and the CME legal department collectively reviewed the designated contract market core principles ("Core Principles") as set forth in the Commodities Exchange Act ("CEA"). During the review, CME staff identified the following Core Principles as potentially being impacted; Prevention of Market Disruption, Execution of Transactions, Protection of Market Participants, and Compliance with Rules.

The proposed Program's incentive structure does not incentivize manipulative trading or market abuse and does not impact the Exchange's ability to perform its trade practice and market surveillance obligations under the CEA. The Exchange's market regulation staff will nevertheless continue to monitor all market participants that trade the Program's products to prevent manipulative trading and market abuse. The fee discount in the proposed Program does not impact the Exchange's order execution. All non-members that execute trades in FX Options traded on Globex® shall be entitled to participate. Chapter 4 of the Exchange rules includes prohibitions against fraudulent, non-competitive, unfair or abusive practices. The proposed Program is subject to these rules.

CME certifies that the Program complies with the Commodity Exchange Act and the regulations thereunder. There were no substantive opposing views to this Program.

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>

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If you require any additional information regarding this submission, please contact Robert Lev at 312-930-3019 or via e-mail at [robert.lev@cmegroup.com](mailto:robert.lev@cmegroup.com), or contact me at 212-299-2200. Please reference our CME Submission No. 11-449 in any related correspondence.

Sincerely,

/s/ Christopher Bowen  
Managing Director, Chief Regulatory Counsel

Attachments

# EXHIBIT 1

## CME Non-Member Globex® Fee Discount Program for FX Options

### Program Purpose.

The purpose of this Program is to incentivize non-members to trade FX Options on the CME Globex® platform. The resulting increase in central limit order book liquidity for FX Options on the CME Globex platform benefits all participant segments in the market.

### Product Scope

FX Options contracts that are traded on the CME Globex® Platform ("Products")

### Eligible Participants

All non-members are eligible to participate. The fee discount described below will be automatically applied to all executed trades in the Products.

### Program Term

Start date is December 13, 2011. End date is December 31, 2012.

### Hours

The incentives will apply to all trades made in the Product by all non-members regardless of the execution time.

### Program Incentives:

Fee Discounts All non-members that trade the Product will have their Globex® execution fees discounted to \$0.40 from the normal price of \$1.00 for trades executed in the Product.

### Monitoring and Termination of Status

The Exchange shall monitor trading activity and participants' performance and shall retain the right to revoke Program participant status if it concludes from review that a Program participant no longer meets the eligibility requirements of the Program.