



Via Electronic Mail

March 11, 2014

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

Re: Security Futures Product Rule Submission
Position Limit Exemption Requests – Notice to Members 2014-01
OCX Submission Number 14-001

Dear Ms. Jurgens:

Pursuant to section 5c(c)(1) of the Commodity Exchange Act, as amended (the “Act”), and §§ 40.6(a) and 41.24 of the regulations promulgated by the Commodity Futures Trading Commission (“CFTC” or the “Commission”) under the Act, OneChicago, LLC (“OneChicago,” “OCX,” or the “Exchange”) hereby submits the following Notice to Members (“NTM”), which will become effective on April 1, 2014.

This NTM requires firms submitting position limit exemptions requests to have an officer or director of the firm who works in the firm’s compliance department sign the request. Currently, OneChicago does not require that position limit exemption requests be signed by an officer or director of the firm’s compliance department; rather, OneChicago simply requires that the requests be signed by an officer or director of the firm. OneChicago is making this change to ensure that compliance personnel at each firm submitting a request are aware of the requested exemption. The NTM is enclosed as Attachment A. OneChicago’s position limit exemption request form with amendments is enclosed as Attachment B.

This filing has been placed on OCX’s public website. The purpose and effect of the NTM is to make the compliance departments of firms requesting positions limit exemptions aware of such requests. Comments on this NTM have not been solicited and none have been received. OneChicago is not aware of any substantive opposing views to this NTM. OneChicago certifies that the NTM complies 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](#). OneChicago staff has reviewed the core principles applicable to designated contract markets (“DCMs”), and has concluded that the proposed NTM may have some bearing upon the following core principles:

Core Principle 2: Core Principle 2 requires DCMs to establish, monitor, and enforce compliance with its rules. The NTM will aid OneChicago's Compliance Department in enforcing its position limit rule (OCX Rule 414) by ensuring that the compliance departments of firms submitting position limit exemption requests are aware of such requests.

Core Principle 4: Core Principle 4 requires DCMs to have the capacity and responsibility to prevent manipulation, price distortion, and disruptions of the delivery or cash settlement process through market surveillance, compliance, and enforcement practices and procedures. The NTM supports Core Principle 4 in that it ensures orderly settlement and delivery by increasing monitoring of its position limit rules.

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,

A handwritten signature in black ink, appearing to read "Waseem Barazi". The signature is fluid and cursive, written over a white background.

Waseem Barazi
Chief Regulatory Officer

Encl: Attachment A
Attachment B

Attachment A



Notice to Members 2014-1

Date: March 11, 2014

Re: Position Limit Exemption Requests

Effective Date: April 1, 2014

OneChicago, LLC (“OneChicago,” “OCX” or the “Exchange”) Rule 414 establishes position limits in security futures products traded on the Exchange. OCX Rule 414(a) prohibits any market participants from controlling or trading in any number of contracts that exceeds position limits. However, OCX Rule 414(b) allows market participants to be exempt from positions limits upon filing of an application in accordance with OCX Rule 414(c).

Currently, OneChicago generally requires that position limit exemption requests be signed by an officer or director of the firm making the filing. OneChicago is now amending this practice to require an officer or director who works in the firm’s compliance department (or equivalent department) to sign the request. OneChicago is making this change to ensure that compliance personnel at each firm submitting a position limit exemption request are aware of the requested exemption.

Any questions can be directed to marketsurveillance@onechicago.com or (312) 424-8530

Attachment B



ONECHICAGO, LLC
POSITION LIMIT EXEMPTION REQUEST

Pursuant to OneChicago Rule 414 (b) _____ [Name] hereby requests an exemption from the OneChicago position limits for hedging/substitution purposes and represents as follows:

1. The position, _____ constitutes a qualified hedge/substitution transaction;
2. The position set forth above is necessary or advisable [Please describe reason];
3. Below is a schedule of the maximum number of Contracts, long and short, that _____ [Name] intends to enter into for hedging purposes: [Insert Schedule]
4. _____ [Name] agrees to comply with any additional limits on its trading as the Exchange may from time to time impose; and
5. _____ [Name] agrees to promptly submit a supplemental statement explaining any change in circumstances that may affect the nature of its positions.

This form should be signed by a member of the compliance department who is an officer or director of the firm.

By: _____ [compliance signature required]
[Insert name, title and contact information]

Submit this form to marketsurveillance@onechicago.com. Any questions should be directed to the regulatory hotline at (312) 424-8530.