# OneChicago 뜬 

Via Electronic Mail

June 10, 2014

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

## Re: OneChicago, LLC Security Futures Product Rule Submission <br> Weekly Futures Rule Change <br> (OCX Submission \#14-004A)

Dear Ms. Jurgens:
Pursuant to section $5 \mathrm{c}(\mathrm{c})(1)$ 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 rule change, which will become effective on June 20, 2014. This filing was originally made on June 5, 2014, but is now being amended to attach a submission cover sheet as per the request of CFTC staff.

On December 20, 2013, OneChicago submitted a filing labeled Amendments to the OCX Rulebook to Incorporate Weekly Futures - Revised Submission (the "December 20th Filing"). The December 20th Filing related to changes OCX made to its Rulebook to incorporate weekly futures with an expedited physical delivery settlement feature. The December 20th Filing made several amendments to the OCX Rulebook and explained the operation of OCX's weekly futures with expedited physical delivery. OCX is now proposing to amend its Rulebook to accommodate identical weekly futures as those described in the December 20th Filing, but with greater listing frequency than originally envisioned and new symbology to correspond with the increased frequency. OneChicago is amending its Rulebook only to the extent that the December 20th Filing insufficiently accommodated these features.

## Frequency

In its December 20th Filing, OCX proposed to list weekly futures expiring on each Friday of the month. Accordingly, the December 20th Filing stated that each month would contain four or five weekly futures (depending on the number of Fridays in a particular month), with a new
weekly future expiring each Friday. OCX is now proposing to list a weekly future every day per week, with each future expiring seven calendar days after listing (on the corresponding day of the next week). ${ }^{1}$ Absent any holiday closures or other extenuating circumstances, OneChicago plans to list five weekly futures every week. The future listed on Monday of Week 1 will expire on the Monday of Week 2, at which time a new Monday future would be listed on Week 2 and would expire on Monday of Week 3, so on and so forth.

## Symbology

The December 20th Filing stated that each weekly future would be labeled with a "W" suffix and a numeral corresponding to the week of the month in which that weekly future expired. For example, the weekly future expiring on the first Friday of the month would end in "1W," the weekly future expiring on the second Friday of the month would end in " 2 W ," so on and so forth. OCX is now modifying that proposal due to the frequency of weekly futures it plans to list. Because OCX plans to list weekly futures that begin and expire on each day of the month, each weekly future will require a unique suffix.

To accommodate these futures, OCX plans to label each weekly future by two characteristics: (1) the week of the month in which the future expires, and (2) the day of the week on which the future expires. Therefore, the weekly future expiring on the Monday of the first week of the month will be the " 1 M ". The weekly future expiring on the Tuesday of the first week of the month will be the " 1 T ". OCX plans to utilize the letters $\mathrm{M}, \mathrm{T}, \mathrm{W}, \mathrm{H}$, and F to correspond to Monday, Tuesday, Wednesday, Thursday, and Friday, respectively. Please see Exhibit B for the schedule by which OCX plans to list and expire its proposed, daily-listed weekly futures.

## Amendments to the OCX Rulebook

The December 20th Filing amended various OCX Rules. The majority of those Rules will not be reamended.

## Rule 414. Position Limits and Position Accountability

Rather than expire the previously-proposed 3 W alongside the monthly 1D and 1C, OCX will now simply expire the currently-proposed 3F alongside the monthly contracts. This is merely a change in symbology, and Rule 414 will not need to be reamended to accommodate this technical change.

## Rule 416. Exchange of Future for Physical

OCX Rule 416 will not be reamended.
Schedule A to Chapter 4
Schedule A to Chapter 4 will not be reamended.

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## Rule 902. Contract Specifications

OCX Rule 902 will not be reamended.

## Rule 905. Form of Specifications Supplement

OCX Rule 905 will not be reamended

## Appendix A to Chapter 9

Appendix A to Chapter 9 will be amended to remove reference to any symbol suffix. Appendix A to Chapter 9 currently describes the ABC1D/ABC1W-5W in its example of the operation of the OCX.NoDivRisk ${ }^{\circledR}$ contract. This change will be made to make clear that the example applies to all NoDivRisk products, regardless of the symbol suffix.

## Appendix B to Chapter 9

Appendix B to Chapter 9 will be amended to remove reference to the previously-proposed "W" suffix. Appendix B will now simply reference a daily identifier. This change is being made to accommodate the various suffixes that may attach to a weekly future.

The purpose and effect of the rule change is to amend the OCX Rulebook to accommodate the listing of up to five weekly futures per week as opposed to one weekly future per week, as previously envisioned in OCX's December 20th Filing. Comments on this rule change have not been solicited and none have been received. OneChicago is not aware of any substantive opposing views to this rule change. OneChicago certifies that the rule change 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 rule change may have some bearing upon the following core principles:

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 new weekly futures OneChicago intends to list will not pose any additional opportunities for manipulative trading activity that OneChicago is not currently capable of detecting.

Core Principle 7: Core Principle 7 requires DCMs to make available information concerning the terms and conditions of the contracts of the DCM and the rules, regulations, and mechanisms for executing transactions on the market. This filing complies with Core Principle 7 because its purpose is to clarify and explain the operation and mechanism of OneChicago's planned weekly futures. Also, OCX displays its product listings and specifications on its public website.

Core Principle 10: Core Principle 10 requires that DCMs maintain rules and procedures to provide for the recording of trade information that enables the DCM to assist in the prevention of market abuses and provide evidence of any violations of rules of the DCM. This filing complies with Core Principle 10 in that all of OneChicago's audit trail and trade reconstruction capabilities will apply in identical fashion to its planned weekly futures.

Core Principle 12: Core Principle 12 requires DCMs establish and enforce rules to protect markets from abusive practices and to promote fair and equitable trading on the market. OneChicago's planned weekly futures will not make its markets more susceptible to abusive practices. Additionally, all trades, regardless of expiry cycle, will fall within the detection capabilities of OCX's proprietary compliance system.

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,


Chief Regulatory Officer

## Encl: Exhibit A <br> Exhibit B

## EXHIBIT A

## Appendix A to Chapter 9*

## OCX.NoDivRisk ${ }^{\text {™ }}{ }^{\text {TM }}$ Processing Example

- ABC NoDivRisk1D/ABC1W 5W futures settles at $\$ 10.00$ on the business day prior to ex-date.
- ABC stock closes at $\$ 10.00$ on the business day prior to ex-date.
- ABC stock is paying a $\$ 0.25$ dividend.
- On the business day prior to ex-date, the exchange notifies OCC of the adjustment amount and publishes an OCX.NoDivRisk Adjustment notice.
- On ex-date, OCC adjusts the prior business day's settlement for all ABC1D futures downward by the adjustment amount, which equals the sum of all distributions going "ex" that day. In this example, OCC adjusts the prior day's settlement price to \$9.75.


## Appendix B to Chapter 9**

## OCX.NoDivRisk®®®ㅡㄴ Products Specifications

As provided for in Rule 902(i), the exchange has designated OCX.NoDivRisk products as a class of security futures contracts that shall be adjusted for the aggregate amount of all cash dividends or distributions and shall be reported by the Exchange to the Clearing Corporation as prescribed in their By-Laws. OCX.NoDivRisk products are identified by a "D" as the ending character in the OneChicago symbol for the monthly OCX.NoDivRisk products and by a unique daily identifier "W" as the ending character in the OneChicago symbel for the weekly OCX.NoDivRisk products.


| Full Name | Listing Date | Ex. Date |
| :---: | :---: | :---: |
| ${ }^{\text {12 Jan-16 }}$ | 30-Dec-15 | 6-Jan-16 |
| 2W, Jan-16 | 6-Jan-16 | 13-Jan-16 |
| 3W/an-16 | 13-an-16 | $2 \mathrm{O}-\mathrm{Ja}$ - |
| 4 Wan -16 | 20-Jan-16 | 27-Jan-16 |
| ${ }^{1 W}$ Feb-16 | 27 |  |
| 2 L feb-16 | 3-feb-16 | 10-ee |
| ${ }^{\text {W F Feb-16 }}$ | 10-Feb-16 | 17-Feb-16 |
| 4 Feb -16 | 17-Feb-16 | 24 -eb- |
| ${ }^{16}$ Mar-16 | 24-Feb-16 |  |
| Mar-16 | 2-Mar-16 | ${ }^{\text {9-M }}$ |
| 3W Mar-16 | 9-Mar-16 | 16-Mar- |
| 4W Mar-16 | 16-Mar-16 | 23-Mar-16 |
| Mar-16 | 23-Mar-16 | 30-Mar-16 |
| Nap-16 | 30-Mar-16 | 6-A |
| 2WApr-16 | 6-Apr-16 | 13-Apr-16 |
| 3W Apr-16 | 13-Apr-16 | 20-Apr-16 |
| 4 W Apr.16 | 20-Apr-16 | 27-Apr-1 |
| IW May-16 | 27-Apr-16 | 4-May-16 |
| 2 W May-16 | 4-May-16 | 11-May-16 |
| 3 W May-16 | 11-May-16 | 18-May-16 |
| 4 W May-16 | 18-May-16 | 25-May-16 |
| IWJun-16 | 25-May-16 | 1-Jun-16 |
| 2W/Jun-16 | 1-Jun-16 | 8-Jun-16 |
| 3 W Jun-16 | 8-Jun-16 | 15-Jun-16 |
| 4 W Jun-16 | 15-Jun-16 | 22-Jun-16 |
| 1W Jul-16 | 22-Jun-16 | 6-Jul-16 |
| 2W Jul-16 | 6-Jul-16 | 13-1 |
| 3W Jul-16 | 13-Jul-16 | 2 O |
| 4 LW Uul16 | 20-Jul-16 | 27-Jul-16 |
| Aus 16 | 27-Jul-16 | 3-Aug-16 |
| 2W Aus 16 | 3-Aug-16 | 10-Aug-16 |
| 3 Wlug -16 | 10-Aug-16 | 17-Aug-16 |
| 4 WAv :16 | 17-Aug-16 | 24-Aug-16 |
| $1{ }^{\text {W Sep-16 }}$ | 24-Aug-16 | 7. Sep-16 |
| $2{ }^{\text {W Sep-16 }}$ | 7 -Sep-16 | 14-Sep-16 |
| 3 W Sep-16 | 14-Sep-16 | 21-Sep-16 |
| 4 W Sp-16 | 21-Sep-16 | 28-Sep-16 |


| Name | Listing Date | Ex. Date |
| :---: | :---: | :---: |
| ${ }^{1 H} /$ Jan-16 | 31-Dec-15 | 7-an-16 |
| $2 \mathrm{H}_{\text {Jan-16 }}$ | 7-Jan-16 | 14-Jan |
| ${ }^{\text {3H/an-16 }}$ | 14-Jan-16 | 21-Jan- |
| Jan-16 | 2-Jan- |  |
| 1 Feb -1 | 28-5 |  |
| eb-16 | eb-1 | 16 |
| $3{ }^{3} \mathrm{Feb}$-16 | 11-Feb-16 |  |
| feb | 18-Feb-16 | 25-Feb |
| Mar-1 | ${ }^{25-\mathrm{eb}-16}$ | 3-Mar |
| Mar-16 | 3-Mar-16 | 10-Mar-16 |
| r16 | 10-Mar-16 | 17-Mar-16 |
| 4 4 Mar-16 $^{\text {a }}$ | 17-Mar-1 | 24-N |
| Mar-16 | 24-Mar-16 | 31-Ma |
| Apr-16 | 31-Mar-16 | 7-A |
| 2 Amp -16 | 7-Apr-16 | 14-Apr-16 |
| 3HApr-16 | 14-Apr-16 | 21-Apr-16 |
| $4 \mathrm{AHPR}-16$ | 21-Apr-16 | 28-Apr-16 |
|  |  |  |
| Mav-16 | 5-May-16 | 12-May-16 |
| May-16 | 12-May-16 | 19-May-16 |
| 4 4 May-16 $^{\text {c }}$ | 19-May-16 | 26-May-16 |
| n.16 | 26-May-16 |  |
| Jun-16 | 2-Jur |  |
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| $2{ }^{2} \mathrm{Hul} 16$ | 7-Jul-16 |  |
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| Jul16 | 21-Jul-16 |  |
| Aug16 |  |  |
| 2HAug 16 | 4-Aug-16 | 11-Aug-16 |
| Aug 16 | 11-Aug-16 | 18-Aug-16 |
| AHAU316 | 18-Aug-16 | 25-Aug-16 |
| Sep-16 | 25-Aug-16 |  |
| 2 H Sep-16 | 1-Sep-16 | 8-Sep-16 |
| ep. 16 | 8-Sep-16 |  |
|  | 15-sep-16 |  |
| Sep. 16 | 22-5 | 29-5 |





[^0]:    ${ }^{1}$ Each weekly future will have a lifecycle of seven days, barring any holidays or other market closures.

