

**ONEXCHANGE BOARD OF TRADE, INC. ("ONXBOT")
ONEXCHANGE CLEARING CORPORATION ("ONXCC")**

Regulations Applicable to Contract Markets or Clearing Houses

The following chart lists and describes the Commission's regulations that are applicable to contract markets or clearing houses. These provisions generally specify actions contract markets are required to take, however, regulations with an asterisk (*) are those which specify things contract markets or clearing houses may do. Regulations which have a double asterisk (**) require a contract market to have a certain specified rule or rules approved by the Commission and placed in its rulebook. The third column lists the ByLaw of or action taken by, ONXBOT and ONXCC that satisfies the regulation or notes its inapplicability to the proposed trading system. The fourth column included comments; mainly references to the proposed Core Principles applicable to Regulated Futures Exchanges ("RFE") under the Commission's proposed "New Regulatory Framework."¹

17 CFR

Part I — General Regulations

Regulation	Description	OnExchange	Comment
1.20(a)	Clearing organizations must segregate customer funds in a separate account which identifies them as such. No customer funds may be obligated to the clearing organization except to purchase commodity futures or options contracts of customers.	All Class B Member funds on deposit with ONXCC will be held in accounts segregated for the benefit of Subscribers. ONXCC Rule 8.02 complies with this Regulation.	

¹ The Core Principles as set forth in the [insert cite to Federal Register] are as follows: 1. Rule enforcement, 2. Products, 3. Position monitoring and reporting, 4. Position limits, 5. Emergency authority, 6. Public information, 7. Transparency, 8. Trading system, 9. Audit trail, 10. Financial standards, 11. Customer protection, 12. Dispute resolution, 13. Governance, 14. Recordkeeping and 15. Competition.

Regulation	Description	OnExchange	Comment
1.20(b)	All customer funds and accruals shall be separately accounted for and segregated as belonging to such customers and deposited under an account name which clearly shows they are customer funds. The clearing organization must retain in its files an acknowledgment that the depository was informed of the status of the funds.	ONXCC Rule 8.02 (a).	
1.25	No clearing organization shall invest customer funds except in obligations of the U.S., in general obligations of any state or political subdivision, or in obligations fully guaranteed by the U.S. Such investments shall be made through accounts used for the deposit of customer funds with proceeds from any sale redeposited.	N/A	
1.26(a)	Each clearing organization shall allow inspection of obligations belonging to customers at any reasonable time by representatives of the Commission.	N/A	
1.26(b)	Each clearing organization which invests customer money in obligations set forth in Reg. 1.25 must separately account for and segregate them as belonging to customers. The account name must show they belong to customers and the clearing organization must retain an acknowledgment form from depository in its files.	N/A	

Regulation	Description	OnExchange	Comment
1.27(a)	Each clearing organization which invests customer funds shall keep records showing date of investment, name of investor, amount, description, depositories, date of liquidation and amount received, and name of recipient.	N/A	
1.27(b)	Each clearing organization which received documents representing investment of customer funds must keep a record showing for each separate clearing member: date of receipt of document, a description, details of disposition.	N/A	
1.29	Clearing organizations may receive interest resulting from investments described in Reg 1.25.	N/A	
1.35(a-1)(2)(iii)*	Each contract market may adopt rules submitted to the Commission that provide alternative requirements to those of Reg 1.35(a-1)(2)(ii) concerning the recording of orders by members on the floor of the Exchange. These rules must require recording of term and timing data and submission of records.	N/A --- There is no exchange floor for ONXCC.	
1.35(a-1)(3)(i)*	Contract markets may have rules (approved by the Commission) which provide for exemption for members from the recordkeeping and other requirements of Reg. 1.35(a-1)(2)(ii) with respect to the case of placement and execution of spread transactions.	N/A.	

Regulation	Description	OnExchange	Comment
1.35(a-1) (3)(ii)	Each contract market must conduct surveillance for compliance with recordkeeping and other requirements of Reg. 1.35(a-1)(2) and (3).	N/A.	RFE 1. Rule enforcement; 9. Audit trail; 14. Recordkeeping
1.35(a-2) (3)**	Each contract market must adopt rules which require its members to provide documentation of cash transactions underlying EFPs upon request.	ONXBOT Rule 4.07 for EFP's and Rule 4.08 for EFS's.	RFE 9. Audit Trail; 14. Recordkeeping
1.35(e)**	Each contract market or clearing house must maintain a single record which shows for each trade: the date, time, quantity, underlying commodity or future, price, delivery month, expiration date, put or call, strike price, floor broker or trader buying and selling, clearing member buying and selling, and CTIs which indicate particular trader information. This information should also show any transaction made non-competitively in accordance with rules which have been approved by the Commission.	ONXBOT trading system will automatically record the required information for each trade. ONXBOT Rules 4.07(g) and 4.08(g) requires records for EFP's and EFS's. There are no options or floor brokers nor are there CTIs.	RFE 9. Audit Trail; 14. Recordkeeping.
1.35(f)	Each contract market must provide for the identification of floor brokers, traders, and clearing members in records required to be kept by use of a distinctive, non-variable designation for each.	N/A — There will be no floor brokers or traders. Class B Members and their Authorized Traders are identified.	RFE 9. Audit Trail; 14. Recordkeeping.

Regulation	Description	OnExchange	Comment
1.35(g)	The actual time of execution of each side of a transaction must be obtained, or, if a contract market identifies and records the time of a transaction, a single actual time of execution for both sides of the transaction may be obtained. (Actual times of execution must be stated in increments of no more than one minute in length.) If a contract market submits rules to the Commission defining opening and closing time periods, it may use them for trades occurring during those times.	The ONXBOT system will automatically record the actual time of execution of each transaction in increments of milliseconds as well as the time of each bid and offer.	RFE 9. Audit Trail; 14. Recordkeeping.
1.35(h)	Each contract market must establish and maintain a record of all changes in the price to the nearest ten seconds of transactions executed on the floor.	The ONXBOT system will automatically record all changes in the prices of futures executed over the system. This record will include the time of all changes in price to the nearest millisecond.	RFE 9. Audit Trail; 14. Recordkeeping.
1.35(i)	Each contract market must use in its rule enforcement program the information obtained in Reg. 1.35(e) to reconstruct rapidly and accurately transactions executed on or subject to the rules of the exchange. Each must submit reports to the Commission concerning the accuracy of all information recorded under Reg. 1.35(e) and its use in its rule enforcement program.	ONXBOT will use in its rule enforcement program the information obtained in Reg. 1.35(e) to reconstruct rapidly and accurately transactions executed on ONXBOT. ONXBOT represents that it will submit all required reports to the Commission as part of its rule enforcement program.	RFE 1. Rule Enforcement.

Regulation	Description	OnExchange	Comment
1.35(j)**	Each contract market must have rules which require trading records prepared by members be submitted within 15 minutes of designated intervals starting with the start of each trading session. Collected cards must be timestamped to the nearest minute. Each must designate as opening and closing periods those periods upon which the opening and closing trading ranges are based for each of its markets.	N/A — There will be no trading cards. The ONXBOT system will capture all trade information that would otherwise be captured on cards.	
1.35(1)*	A contract market which can demonstrate that it currently has available hand-held terminals or such other automated means for the recordation of trades which can eliminate the opportunity for improper alteration or fabrication of trading records may petition the Commission for an exemption from various subparagraphs of Reg. 1.35(a-1).	It is not possible to alter or fabricate trading records on the ONXBOT system.	
1.36(b)	Each clearing organization which receives particular customer property in lieu of margin transactions must keep a record which will show for each member the date such property was received, the depository where segregated, and details of disposition.	N/A	
1.38(a)	All futures and options transactions executed on a contract market must be done openly and competitively during prescribed hours. This does not apply to transactions executed noncompetitively in accordance with written rules of the contract market approved by the Commission and specifically providing for these transactions.	ONXBOT Rules 4.01, 4.02, 4.06, 4.07, and 4.08.	RFE 8. Trading System.

Regulation	Description	OnExchange	Comment
1.39(a)**	No member of a contract may execute cross orders except in conformity with rules of the contract market which have been approved by the Commission. Each contract market must keep a record of each cross transaction.	ONXBOT Rule 4.05 (e).	RFE 8. Trading System.
1.39(b)**	Cross transactions may be executed in compliance with large order execution procedures if established by written rules of a contract market which have been approved by the Commission. If the procedures do not meet the requirements of Reg. 1.39(a), the contract market may be granted an exemption if it petitions.	OXNBOT Rule 4.06.	RFE 8. Trading Systems.
1.41(b)	All proposed contract market rules that relate to terms and conditions and any other rules the Commission determines require prior approval must, and any other rule may, be submitted to the Commission for approval pursuant to Section 5a(a)(12)(A) of the Act. Each contract market must explain the operation, purpose and effect of each proposed rule or rule amendment.	Except in circumstances where Regulation 1.41 (z) may be applicable, ONXBOT will submit all proposed contract market rules that relate to terms and conditions, and any other rules the Commission requires, to the Commission for prior approval.	
1.41(c)	One copy of any rule which does not relate to terms and conditions or which a contract market proposes to place into effect without Commission approval must be furnished to the Commission at least ten days prior to its effective date. Each contract market must explain the operation, purpose and effect of each proposed rule or rule amendment.	Except for emergency rules, ONXBOT will furnish the Commission with a copy of any proposed rule which it proposes to place into effect without Commission approval at least ten days prior to its effective date.	

Regulation	Description	OnExchange	Comment
1.41(f)*	By a two-thirds vote of its governing board, a contract market may place into immediate effect a temporary emergency rule for 30 days to deal with an emergency (as defined) without prior Commission approval and without compliance with the ten-day notice requirement but must follow the subsequent procedures set forth in the regulation, including Commission notification containing specified information.	ONXBOT Bylaws § 3.8	RFE 5. Emergency Authority.
1.41(g)*	In the event of a "physical emergency" a contract market official may take action pursuant to a rule that has been approved by the Commission or has become effective without prior approval. Suspension of trading may not continue more than five days except where the Commission has granted an extension of time. A contract market must notify T&M of implementation, modification, or termination of any physical emergency action as soon as possible.	ONXBOT Bylaws § 3.8	RFE 5. Emergency Authority.
1.42	Each contract market must furnish the Commission a copy of each notice of delivery issued by any member and any endorsements in accordance with any special call made by the Commission.	ONXBOT shall furnish the Commission a copy of each notice of delivery issued to a Subscriber, and any endorsements in accordance with any special call made by the Commission.	
1.43	Each contract market must submit or direct submission of information about certain warehouses and depositories upon request by the Commission.	ONXBOT represents that it will comply.	

Regulation	Description	OnExchange	Comment
1.44	Each contract market must require the operators of certain warehouses and depositories to keep certain records, make certain reports if requested by the Commission, and permit visits by certain authorities if requested.	ONXBOT represents that it will comply.	
1.45	Each contract market must require that all futures contracts provide for delivery of U.S. standard or other Commission-adopted standard conforming grades of commodities.	ONXBOT will not list deliverable contracts without addressing this rule with the Commission.	RFE 2. Products.
1.50	Each contract market must file with the Commission upon its request a report that demonstrates that it is complying with the conditions and requirements of Sections 5 and 5a(a) of the Act and the regulations.	ONXBOT represents that it will comply.	
1.51	Each contract market must use due diligence in maintaining a continuing affirmative action program to secure compliance with the provisions of Sections 5, 5a(a), 5b, 6(b), 6b, 8a(7), 8a(9), and 8c of the Act, the regulations implementing Section 4c(c) of the Act, and the contract market's own rules it is required by the Act to enforce. This program should include market, trade practice, and financial surveillance, and investigation of and discipline for violations of its rules. Each contract market must keep full records of all action taken as part of the program.	ONXBOT will enter into an agreement with NFA whereby NFA will conduct trade and financial surveillance. ONXBOT will conduct market surveillance.	RFE 1. Rule Enforcement; 3. Position monitoring and reporting; 9. Audit trail; 10. Financial standards; 14. Recordkeeping.

Regulation	Description	OnExchange	Comment
1.52(b)**	Each SRO must submit for Commission approval, rules prescribing minimum financial and related reporting requirements for all FCM members. Each contract market having an IB membership category must submit the same types of rules for IBs. Each SRO must submit all changes to these rules. The requirements must be at least as stringent as those in Regs 1.10 and 1.17.	Not applicable; however, ONXBOT and ONXCC will suspend or terminate defaulting Subscribers/Class B members.	RFE 10. Financial standards.
1.52(c)*	Any two or more SROs may file for Commission approval a plan for delegating to a DSRO for any registered FCM or IB which is a member of more than one such SRO, the responsibility of monitoring for compliance with minimum financial and reporting requirements. The Commission will approve if the plan meets certain criteria. Upon approval, an included SRO is deemed to have met requirements of Reg-1.51. An SRO must notify its members of an approved plan. Each SRO must notify the Commission if any registrant is no longer in good standing.	N/A.	
1.53	Each contract market must enforce each of its rules that relates to trading requirements unless those rules have been disapproved by or their revocation by the contract market has been approved by the Commission.	ONXBOT represents that it will comply.	

Regulation	Description	OnExchange	Comment
1.59(b)**	Each SRO must maintain in effect rules submitted to the Commission that prohibit its employees from trading in any commodity interest where the employee has access to material nonpublic information concerning the commodity interest, from disclosing to any person (other than to a proper authority for regulatory or other proper purposes) any material nonpublic information obtained as an employee which could reasonably be expected to assist in trading. Each SRO may have rules which must be approved by the Commission which set forth circumstances under which exemptions from the employee trading prohibition may be granted.	ONXBOT Bylaws § 7.11; ONXBOT Rule 9.03; ONXCC Bylaws § 5.11; ONXCC Rules 1.05.	RFE 13. Governance.
1.59(c)**	Each SRO must maintain in effect rules which have been submitted to the Commission which provide that no member of the governing board or a committee may use or disclose material nonpublic information obtained as a result of board or committee participation.	ONXBOT Bylaws § 3.7.	RFE 13. Governance.
1.60	Every contract market must submit to the Commission copies of the complaint, decision, and notice of appeal concerning any pending legal proceedings if the Commission requests. Each also must submit copies of the same for any pending legal proceeding against an official alleging violation of commodity laws, contract market rules, or state law governing the organization.	ONXBOT represents that it will comply.	

Regulation	Description	OnExchange	Comment
1.61(a)**	<p>Each contract market must, for each separate type of contract for which delivery months are listed to trade, submit for Commission approval rules which limit the maximum net long and net short position which any one person may hold. This does not apply to a contract market for which position limits are set under Part 150. Each must demonstrate that it has complied with the purpose and standards of the regulation and must describe its method of surveillance and enforcement with respect to its futures position limit rules. Each must file with the Commission upon its request a written statement justifying the existing level of futures position limits.</p>	<p>Except in so far as Regulation 1.41 (z) applies, position limits will be submitted to the Commission on a contract-by-contract basis.</p>	
1.61(b)**	<p>Each contract market which trades option contracts must for each put and call submit for Commission approval a rule which limits the maximum net long option positions and net short option positions which any one person may hold or control. Each must demonstrate that it has complied with the purpose and standards of the regulation and must describe its method of surveillance and enforcement with respect to its options position limit rules. Each must file with the Commission upon its request a written statement justifying the existing level of options position limits.</p>	<p>Not applicable; options are not listed.</p>	

Regulation	Description	OnExchange	Comment
1.62**	<p>Each contract market must adopt and enforce rules which have been approved by the Commission or allowed into effect which prohibit any person in or surrounding a trading pit from buying or selling for another any contract unless such person is registered as a floor broker or buying or selling for their own account any contract unless registered as a floor trader. The rules must provide that a broker or trader may not act as such during any suspension of registration or floor access. Each must have rules which provide for requests for withdrawal of broker or traders, training, and review of registration information. Each must notify the Commission (via T&M) of facts regarding any broker or trader which are set forth as statutory disqualifications or termination of floor trading privileges for cause.</p>	N/A	RFE 11. Customer protection.

Regulation	Description	OnExchange	Comment
1.63**	<p>Each SRO must have rules that have been submitted to the Commission that render a person ineligible to serve on, among other panels, its disciplinary committees and governing board who, for example, among other things, was found guilty of a disciplinary offense within the last three years, is suspended from trading, has had a registration revocation within the past three years, or is suspended from serving on a governing board under federal securities laws. Each SRO must submit a schedule of all violations which are disciplinary offenses and a list of any persons who have been removed from committees, etc., pursuant to this regulation.</p>	<p>ONXBOT Bylaws § 3.6; ONXCC Bylaws § 4.02.</p>	<p>RFE 13. Governance.</p>

Regulation	Description	OnExchange	Comment
1.64(b)**	<p>Each SRO must maintain in effect standards and procedures with respect to its governing board which have been submitted to the Commission that ensure that 20% or more of the regular voting members of the board are persons who are knowledgeable of futures trading and, among other things, are not members or employees of the SRO. At least ten percent of the board must be comprised of persons representing farmers, producers, merchants, or exporters of commodities. The board must also represent a diversity of the interests at the SRO. The SRO must be able to demonstrate that the board membership fairly represents the diversity of interests at the SRO and is otherwise consistent with the regulation's composition requirements.</p>	ONXBOT Bylaws § 3.2 (e), (f) and (g).	RFE 13. Governance.
1.64(c)**	<p>Each SRO must maintain in effect rules with respect to its major disciplinary committees which have been submitted to the Commission that ensure that at least one member of each major disciplinary committee is not a member of the SRO when the committee is acting with respect to certain matters, and that, for contract markets, more than 50% of each major disciplinary committee include persons representing membership interests other than that of the respondent, and include sufficient different membership interests to ensure fairness.</p>	ONXBOT Bylaws § 5.1 (c)	RFE 13. Governance.

Regulation	Description	OnExchange	Comment
1.67	Each contract market must notify an FCM that cleared a transaction that was the subject of a rule violation by another member that resulted in harm to the customer of such FCM of the disciplinary action.	N/A.	
1.69	Each contract market must maintain in effect rules to address avoidance of conflicts of interest in the execution of self regulatory functions which establish procedures for determining whether members of governing boards or disciplinary committees are subject to a conflict of interest restriction in any matter involving a named party in interest or in which the member has a direct and substantial financial interest in the result of a vote.	ONXBOT Bylaws § 4.5	RFE 13. Governance.

Part 5 — Contract Market Compliance

Regulation	Description	OnExchange	Comment
5.2	No dormant contract market may list additional months or expirations for trading or otherwise permit trading to restart in a dormant contract until the Commission approves the applicable rules.	ONXBOT represents that it will comply.	

Part 8 — Exchange Disciplinary Procedures

Regulation	Description	OnExchange	Comment
8.05	Each exchange must have an enforcement staff of non-members to conduct investigations, prepare reports and prosecute possible rule violations.	ONXBOT will have a compliance staff, surveillance department and assistance from the NFA.	RFE 1. Rule enforcement.
8.06	Each exchange must have a disciplinary procedure which requires the enforcement staff to conduct investigations of possible rule violations upon request of the Commission or the discovery of information which indicates a basis for a violation.	ONXBOT Rule 7.01 (a).	RFE 1. Rule enforcement.
8.07	The enforcement staff must submit a report to the disciplinary committee when it determines that a basis exists for finding a violation.	ONXBOT Rule 7.01 (a).	RFE 1. Rule enforcement.
8.08	Each exchange must establish one or more disciplinary committees to determine whether violations have been committed, accept settlement offers and impose penalties. No person on the enforcement staff may serve on the disciplinary committee.	ONXBOT Rules 7.01; 7.04; 7.05; 7.06.	RFE 1. Rule enforcement.

Regulation	Description	OnExchange	Comment
8.09	Disciplinary committees must promptly review each investigation report and request further investigation if needed. They must then determine to have a notice of charges served or direct that no further action be taken.	ONXBOT Rules 7.01; 7.02.	RFE 1. Rule enforcement.
8.10*	An exchange may adopt rules which set specific predetermined maximum penalties for particular violations.	N/A	
8.11*	Any notice of charges must contain certain information. Exchange rules may provide that failure to request a hearing within the period prescribed in the notice will be a waiver of the right to a hearing and that failure in an answer to deny a charge will be an admission of the charge.	ONXBOT Rules 7.02; 7.03 (b) and (c).	RFE 1. Rule enforcement.
8.13**	The rules of an exchange may provide that the answer must be in writing and have a statement of admission, denial, or lack of sufficient information. The rules may provide that failure to file an answer in time may be an admission of allegations and failure to deny a charge may be admission of the charge.	ONXBOT Rule 7.03.	RFE 1. Rule enforcement.

Regulation	Description	OnExchange	Comment
8.14*	The rules of an exchange may provide that if the respondent admits or fails to deny any of the charges the disciplinary committee may find that the rule violation alleged in the notice of charges has been committed. The disciplinary committee may impose a penalty (no greater than the predetermined penalty, if any). The committee must notify the respondent of the penalty and that he may request a hearing (unless a predetermined penalty was imposed). The rules may provide that if a respondent fails to request a hearing he will be deemed to have accepted the penalty.	ONXBOT Rules 7.03 (b), (c) and (d).	RFE 1. Rule enforcement.
8.15**	Exchange rules may provide that the hearing will be concerned only with those charges denied and/or penalties (other than predetermined) set by the committee.	ONXBOT Rule 7.04.	RFE 1. Rule enforcement.
8.16*	The rules of an exchange may permit a respondent to submit a settlement offer after the investigation report is completed. This may be accepted but not altered without agreement of the respondent. The rules may permit the respondent to accept a penalty without admitting or denying the underlying rule violations. If a settlement offer is accepted by the committee it must issue a decision.	ONXBOT Rule 7.06.	RFE 1. Rule enforcement.

Regulation	Description	OnExchange	Comment
8.17**	Disciplinary hearings required by Part 8 must be held in accordance with certain minimum procedural requirements. Exchange rules may provide that transcription costs be borne by respondent in certain instances. The rules may provide that a penalty may be summarily imposed on any person within its jurisdiction whose action impede hearing progress.	ONXBOT Rule 7.04.	RFE 1. Rule enforcement.
8.18**	Promptly following a hearing the disciplinary committee must render a written decision containing certain information.	ONXBOT Rule 7.05.	RFE 1. Rule enforcement.
8.19*	Exchange rules may permit a respondent to appeal an adverse decision in all or in certain classes of cases. The rules may require a respondent's notice of appeal to be in writing and to specify the findings, conclusions, and penalty to which objection is taken. If the rules provide for appeal the contract market must establish a board of appeals and may provide that the appeal board may order a review of a decision. The rules must prohibit a member of the appeals board from serving if he participated in any prior stage of the proceeding. The appeals board must issue a decision containing certain information.	ONXBOT Rule 7.07.	RFE 1. Rule enforcement.
8.20**	Each exchange must establish rules setting forth when a decision becomes final.	ONXBOT Rules 7.05; 7.07 (g).	RFE 1. Rule enforcement.

Regulation	Description	OnExchange	Comment
8.25	An exchange may suspend or take other summary action against a person upon a reasonable belief that immediate action is necessary to protect the best interests of the marketplace.	ONXBOT Rule 7.08.	RFE 1. Rule enforcement.
8.26**	A member responsibility action must take place in accordance with exchange procedures which require the respondent to be served with a notice containing various information beforehand, if possible, or at the earliest possible opportunity after action is taken, be given an opportunity for a subsequent hearing, and allow the respondent to be represented by counsel. The exchange must render a decision containing various information. The rules may permit the respondent to appeal an adverse decision. These rules must meet the requirements of Reg. 8.19.	ONXBOT Rule 7.08.	RFE 1. Rule enforcement.
8.27*	An exchange may adopt rules which permit appropriate persons to summarily impose minor penalties for violations of rules regarding decorum, attire, the timely submission of accurate records required for clearing or verifying each day's transactions or other similar activities.	N/A	RFE 1. Rule enforcement.
8.28**	Each exchange must establish rules setting forth when a decision rendered under Subpart C of Part 8 is final.	ONXBOT Rule 7.08 (e).	REF 1. Rule enforcement.

Part 9 — Review of Exchange Action

Regulation	Description	OnExchange	Comment
9.11	Whenever an exchange decision pursuant to which a disciplinary action or access denial action (other than a summary action) is to be imposed has become final, the exchange must deliver certified written notice of the action containing certain information to the person against whom it was taken and to the Commission.	ONXBOT represents that it will comply.	
9.12	No final disciplinary or access denial action may be made effective by the exchange before fifteen days after delivery of written notice except as provided in this regulation.	ONXBOT submits that this procedure is inapplicable.	
9.13	An exchange must publicize as soon as effective an adverse disciplinary finding it made by disclosing at least the information contained in the notice required by Reg 9.11 (b) by posting notice for five consecutive business days in a conspicuous place to which members and the public have regular access.	ONXBOT submits that this procedure is inapplicable.	
9.21	An exchange must file two copies of a certified record of the proceeding within thirty days after service of a notice of appeal to the Commission.	ONXBOT represents that it will comply.	
9.23	An exchange must file an answering brief within 30 days after service of an appeal brief.	ONXBOT represents that it will comply	

Part 16 — Reports

Regulation	Description	OnExchange	Comment
16.00	Each contract market must submit to the Commission a report for each business day showing specified information about futures positions for each clearing member by proprietary and customer account.	Not applicable; ONXBOT does not have clearing members.	
16.01	Each contract market must publish and providing the Commission for each business day specified information concerning trading volume, open contracts, and prices of futures and options, and certain additional information.	ONXBOT represents that it will comply.	
16.02	Each contract market must submit to the Commission a weekly report for options on futures and cash-settled options on physicals and a daily report on all other options on physical containing certain specified information for each option trader controlling a reportable option position.	N/A	
16.03	Each contract market must provide to the appropriate regional office of the Commission account option trader identification information which CMS, members and foreign brokers are required to provide to contract markets under Reg. 17.01.	N/A	

Part 21 — Special Calls

Regulation	Description	OnExchange	Comment
21.02	Each contract market must furnish to the Commission upon special call, various information concerning accounts of traders owning or controlling option positions.	Not applicable; ONXBOT is not an FCM or IB.	
21.03	If the Commission has reason to believe that an FCM or customer has not responded to a call made pursuant to this regulation, the contract market specified in the call must prohibit the execution of trades on the contract market and in the months or expiration dates specified in the call for or on behalf of the FCM or customer named in the call unless trades would offset existing open contracts of the FCM or custom	Not applicable; ONXBOT is not an FCM or IB.	

Part 150 — Position Limits

Regulation	Description	OnExchange	Comment
150.2	Each contract market must have rules which prohibit any person from holding or controlling net long or net short positions for the purchase or sale of a features or options contract in excess of amounts set forth in this regulation.	ONXBOT will set position limits on a contract-by-contract basis.	
150.6	Each contract market remains responsible for preventing manipulation and corners.	This responsibility will be addressed as part of ONXBOT's market surveillance program.	

Part 155 — Traded Standards

Regulation	Description	OnExchange	Comment
155.2(a-b)**	Each contract market must adopt and submit rules which prohibit floor broker members from trading ahead of customers.	Not applicable; however, ONXBOT prohibits cross trades other than Block Trades, EFPs and EFSs.	RFE 11. Customer protection.
155.2(c)**	Each contract market must adopt and submit rules which prohibit floor broker members from discretionary trading.	N/A	RFE 11. Customer protection.
155.2(d)**	Each contract market must adopt and submit rules which prohibit floor broker members from disclosing customer orders.	N/A	RFE 11. Customer protection.
155.2(e)**	Each contract market must adopt and submit rules which prohibit floor broker members from taking the opposite side of orders.	N/A	RFE 11. Customer protection.
155.2(f)**	Each contract market must adopt and submit rules which prohibit floor broker members from engaging in prearranged trading.	N/A	RFE 11. Customer protection.
155.2(g)**	Each contract market must adopt and submit rules which prohibit floor broker members from allocating trades among accounts.	N/A	RFE 11. Customer protection.
155.2(h)**	Each contract market must adopt and submit rules which prohibit floor broker members from withholding customer orders.	N/A	RFE 11. Customer protection.

Regulation	Description	OnExchange	Comment
155.2(i)**	Each contract market must adopt and submit rules which require every floor broker member to promptly confirm order execution with the opposite broker or petition for exemption with a rule that will insure that the opposite sides of every trade executed can be effectively matched and will be accepted by a clearing member.	N/A	RFE 11. Customer protection.
155.5**	Each contract market in which the average daily trading volume equals or exceeds 8000 contracts for each of four quarters during the most recent volume year, unless granted an exemption petition by Commission order based on the sufficiency of the contract market's trade monitoring system, must adopt rules that have been made effective under the Act and regulations to prohibit dual trading (except in accordance with contract market rules submitted to the Commission to, among other things, offset certain trading errors, execute certain spread orders, or address emergency market conditions).	N/A	RFE 8. Trading system.

Part 156 — Broker Associations

Regulation	Description	OnExchange	Comment
156	Each contract market must adopt rules which have been submitted to the Commission that define the term "broker association" to include certain relationships, prohibit certain described conduct, and require registration of each broker association relationship which must include various information about the broker association relationship.	N/A	RFE 8. Trading system; 11. Customer protection.

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Part 180 — Arbitration

Regulation	Description	OnExchange	Comment
Part 180	Every contract market must adopt rules which provide for a fair and equitable procedure through arbitration or otherwise for the settlement of customer's claims and grievances against any member or employee of a member which must include various minimum requirements for a fair and equitable procedure. Customers must be provided with the choice of a panel composed of a majority of persons who are not members. The rules may require the customer to request the mixed panel when he submits his grievance, etc..	ONXBOT will contract with NFA to provide an NFA-administered arbitration forum to Subscribers who have grievances against ONXBOT or another Subscriber. NFA procedures will apply to such proceedings.	RFE 12. Dispute resolution.

Part 190 — Bankruptcy

Regulation	Description	OnExchange	Comment
190.05	Each contract market must adopt and enforce rules approved by the Commission which permit delivery on a contract which has not become part of the debtor's estate as of the entry of the order of relief but as to which trading has ceased, notice of delivery has been tendered or trading ceased before it can be liquidated.	Not applicable because there are no "customers" of a debtor. Each Subscriber is a Clearing Member and a principal versus the clearing organization.	RFE 10. Financial standards.