



Via Portal Submission

August 3, 2016

Christopher J. Kirkpatrick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: OneChicago, LLC Rule Submission
Issuing Regulatory Release 2016-18 (Large Trader Reporting Guide) &
Regulatory Release 2016-19 (OneChicago Ownership and Control Reports)
(OCX Submission Number 16-016)

Dear Mr. Kirkpatrick:

Pursuant to section 5c(c)(1) of the Commodity Exchange Act, as amended (the “Act”), and § 40.6(a) 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 Regulatory Releases (“RRs”). OneChicago is amending its Large Trader Reporting Guide (“LTR Guide”) and Ownership and Control Reports notice (“OCR Guide”) to accommodate the decrease of the reportable level for OneChicago products to one (1) contract (see RR 2016-14). The LTR Guide is also being updated to reflect that OneChicago will stop accepting Large Trader Reports generated by the OCC on behalf of fully disclosed accounts as of January 2, 2017. The LTR Guide is enclosed as Attachment A. The OCR Guide is enclosed as Attachment B.

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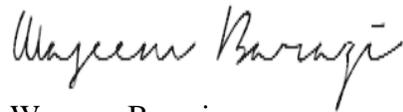
The purpose and effect of the RR is to instruct market participants on how to report large trader positions and ownership and control reports to OneChicago. Comments on the RR have not been solicited and none have been received. OneChicago is not aware of any substantive opposing views to these RRs. OneChicago certifies that the RRs 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](#).

OneChicago staff has reviewed the core principles applicable to designated contract markets (“DCMs”), and has concluded that the RRs may have some bearing upon the following core principle(s):

Core Principle 7: Core Principle 7 requires DCMs to make available to market authorities, market participants, and the public accurate information concerning the rules and regulations for executing transactions on the contract market. The RR supports Core Principle 7 in that it provides market participants with a useful and updated guide regarding how to report large trader positions and ownership and control reports.

If you have any questions or comments related to this filing, please feel free to contact me by telephone at (312) 883-3441 or through e-mail at wbarazi@onechicago.com.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Waseem Barazi".

Waseem Barazi
Chief Regulatory Officer and Associate General Counsel

Encl: Attachment A
Attachment B

Attachment A

(See Following Page)

Date: August 3, 2016

Re: Large Trader Reporting Guide

Effective Date: August 15, 2016: (Reportable Level Decreases to 1 Contract)
January 2, 2017: (LTR Submissions Must be Made Directly to OCC)

This Notice to Members Regulatory Release (“NTMRR”) 2015-47 2016-18 supersedes NTM 2010-12 RR 2015-47 to eliminate any references to the Securities Industry Automation Corporation (“SIAC”) and to provide an updated large trader reporting (“LTR”) guide. As of November 23, 2015, OneChicago, LLC (“OneChicago” or “OCX”) has eliminated the role of SIAC in LTR of OneChicago products. require that all Reporting Firms submit Large Trader Reports directly to the OCC in the CFTC format, and to discontinue acceptance of Large Trader Reports created by OCC on behalf of fully disclosed accounts. Additionally, this guide is being updated to reflect the decrease of the reportable threshold in OneChicago products to one (1) contract.

Large Trader Position Reporting

Reporting Firms

Exchange Clearing Members, Futures Commission Merchants (“FCMs”), broker-dealers (“BDs”), and foreign brokers (together, “Reporting Firms”) are required to report position information on behalf of accounts carried on their books that have any position at or above the reportable level of 200 contracts in a OneChicago Contract. Reporting Firms are required to report this large trader data to the Options Clearing Corporation (the “OCC”), which will then forward the information to OneChicago and to the Commodity Futures Trading Commission (“CFTC”). ~~OneChicago collects large trader data and transmits it to the CFTC on behalf of all Reporting Firms.~~

Reportable Accounts

A reportable account is any account, including customer, firm, or market maker that meets the reportable level. Each account that has been in reportable status must also be reported on the first day that it falls below the reportable level.

Reportable Level

For all OneChicago security futures products, the reportable level is 200 1 contracts on either side of the market in a single expiration/contract month. ~~Once the 200 contract threshold level is met in any expiration/contract month, all other positions in the same contract in other~~

expiration/contract months on the same exchange must be reported. The following is an example of when a report must be filed:

Example: An account establishes a position of 200 IBM June SSF contracts on OCX and also maintains positions of 50 IBM July and 100 IBM Sep SSFs contracts traded on OCX. The threshold level of 200 contracts is met in the IBM June SSF, so the entire position of 350 contracts must be reported.

Aggregated Accounts

For purposes of determining whether a large trader meets the 200 contract reporting threshold, reporting firms must aggregate accounts with common ownership and/or trading control, and report the positions under one reporting account number. (See CFTC Reg. 17.00(b) for the rules on aggregating accounts for reporting purposes).

Methods of Reporting

Firms carrying positions must report directly to the OCC, which will forward the reports to OneChicago and the CFTC. Beginning on January 2, 2017, OneChicago will no longer accept Large Trader Reports created by the OCC on behalf of fully disclosed accounts (individual market-maker and clearing firm accounts that clear directly). All such accounts must submit their Large Trader Reports to the OCC in the CFTC format. OneChicago, which will report those positions to the CFTC. Reporting Firms can make arrangements with the OCC to report positions for accounts that clear in the Market Maker or Firm range at the OCC. For those firms submitting LTR to OneChicago, the reports must be submitted to OneChicago by 7:00 a.m. Central Time (8:00 a.m. Eastern Time).

Reporting Format

Reporting Firms must report LTR data in the format required by the CFTC. Please see the CFTC website for specifications.

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Any questions regarding this RR should be directed to OneChicago Operations at operations@onechicago.com.

Attachment B

(See Following Page)

Date: August 3, 2016
Re: OneChicago Ownership and Control Reports
Effective Date: November 7, 2016

OneChicago, LLC (“OneChicago” or “OCX”) is issuing this ~~Notice to Members~~ Regulatory Release (“NTMRR”) 2016-129 to provide market participants with instructions on how to comply with OCX Rule 516 (Ownership and Control Reports) (adopted April 6, 2015). OCX Rule 516 requires that “Clearing Members report to the Exchange in a form and manner prescribed by the Exchange reportable positions and related information relating to Exchange Contracts that Clearing Members are required to report to the Commission pursuant to Commission regulations.”

This NTMRR supersedes RR 2016-12 to reflect the decrease in reportable level to one (1) contract for Large Trader Reporting and Ownership and Control Reports. ~~NTM 2015 7 insofar as NTM 2015 7 discusses instructions related to Ownership and Control Reports (“OCR”) reporting on OneChicago. This NTM supersedes NTM 2015 31, which previously postponed the effective date of OCR reporting to July 27, 2016.~~

OneChicago Ownership and Control Reports

On November 18, 2013, the Commodity Futures Trading Commission (“CFTC”) published its final OCR rules. OneChicago will begin requiring submission of Form 102 information in the same format as will be required by the CFTC. For technical specifications, please refer to the CFTC Technical Guidance Document, available [here](#). OneChicago will only accept OCR in the CFTC format.

OCR submissions by market participants must be made electronically in one of two ways. For firms participating in FIA Technology Services, Inc.’s (“FIA Tech”) OCR solution, submissions will be sent from FIA Tech to OneChicago on behalf of those firms. For firms not participating in the FIA Tech OCR solution, OneChicago will establish a secure file transfer protocol (“SFTP”) directory to which the non-participating firms must submit Form 102 information in the same format as is required by the CFTC. Each OneChicago Clearing Member must notify OneChicago whether it will participate in the FIA Tech OCR solution or whether it will submit the Form 102 information to OneChicago electronically via SFTP.

Required Reporting to OneChicago

OneChicago will require electronic filing of the following forms:

- **New Form 102A:** This form collects information with respect to position-based special accounts. A special account is any account with a reportable position. The OneChicago exchange level reportable position for Form 102A is ~~two hundred one (2001)~~ one (2001) contracts in any security futures product (overlying either an individual equity security or narrow-based security index). Form 102A must be submitted to OneChicago by 9:00 a.m. CT on the business day following the date on which a special account becomes reportable. OneChicago will begin requiring the electronic submission of New Form 102A on November 7, 2016.
- **New Form 102B:** This form requires the transaction-based reporting of trading accounts that have daily trading volume that exceeds a specified level in a single trading day, regardless of whether the accounts maintain positions at the end of the day. The OneChicago exchange level reportable position for Form 102B is fifty (50) contracts in any security futures product (overlying either an individual equity security or narrow-based security index) with the same product identifier, or any such other level as determined by the CFTC. Form 102B must be submitted to OneChicago by 9:00 a.m. CT on the business day following the date on which a volume threshold account becomes reportable. OneChicago will begin requiring the electronic submission of New Form 102B on November 7, 2016.

Testing

OneChicago began accepting and processing test files for OCR submission on July 6, 2016. The file naming convention for submissions and test submissions should be as indicated in the CFTC Technical Guidance Document, follows:

~~File Naming Convention – Batch Submission. The file name for live submissions should be created in the following manner:~~

~~OCRFORM_[FORMNUMBER]_[IDENTIFIER]_[YYYYMMDD]_[SOURCE].format~~

~~File Naming Convention – Test Files. Reporting firms can test their submissions by appending the string “TEST” to the end of their file names.~~

~~OCRFORM_[FORMNUMBER]_[IDENTIFIER]_[YYYYMMDD]_[SOURCE]_TEST.format~~

Milestone Dates

May 23, 2016: Reporting firms began onboarding and connectivity testing to the OneChicago User Acceptance Test (“UAT”) and production environments.

July 6, 2016: Reporting firms began user acceptance testing for conformance in the UAT environment.

October 3, 2016: OneChicago begins accepting and processing electronic OCR submission in its production environments. Firms successfully submitting electronic OCR to OneChicago's production environment are not required to submit legacy PDFs in the period between October 3, 2016 and November 7, 2016.

November 7, 2016: All reporting firms are required to have migrated to electronic OCR submission.

Please note the following:

- OneChicago's reportable levels are lower than the CFTC's reportable levels and therefore a Form 102A may be required by OneChicago earlier than the CFTC would require.
- OneChicago will require Clearing Members and omnibus accounts to submit Form 102A and all related accounts as well as Form 102B accounts.
- All Clearing Members, including those that trade solely proprietarily for their own accounts, will be required to submit OCR electronically.
- Prior to November 7, 2016, Reporting Firms may continue to submit legacy Form 102's at the reportable level of 200 contracts.

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Any questions regarding OCR can be directed to OneChicago Operations through phone at (312) 883-3411 or through e-mail at operations@onechicago.com.