

SUBMISSION COVER SHEET

IMPORTANT: Check box if Confidential Treatment is requested

Registered Entity Identifier Code (optional): 20-071

Organization: The Board of Trade of the City of Chicago, Inc. ("CBOT")

Filing as a: DCM SEF DCO SDR

Please note - only ONE choice allowed.

Filing Date (mm/dd/yy): January 15, 2020 Filing Description: Implementation of the Eris Swap Futures Block Market Maker Program

SPECIFY FILING TYPE

Please note only ONE choice allowed per Submission.

Organization Rules and Rule Amendments

- Certification § 40.6(a)
- Approval § 40.5(a)
- Notification § 40.6(d)
- Advance Notice of SIDCO Rule Change § 40.10(a)
- SIDCO Emergency Rule Change § 40.10(h)

Rule Numbers: Not Applicable

New Product

Please note only ONE product per Submission.

- Certification § 40.2(a)
- Certification Security Futures § 41.23(a)
- Certification Swap Class § 40.2(d)
- Approval § 40.3(a)
- Approval Security Futures § 41.23(b)
- Novel Derivative Product Notification § 40.12(a)
- Swap Submission § 39.5

Official Product Name:

Product Terms and Conditions (product related Rules and Rule Amendments)

- Certification § 40.6(a)
- Certification Made Available to Trade Determination § 40.6(a)
- Certification Security Futures § 41.24(a)
- Delisting (No Open Interest) § 40.6(a)
- Approval § 40.5(a)
- Approval Made Available to Trade Determination § 40.5(a)
- Approval Security Futures § 41.24(c)
- Approval Amendments to enumerated agricultural products § 40.4(a), § 40.5(a)
- "Non-Material Agricultural Rule Change" § 40.4(b)(5)
- Notification § 40.6(d)

Official Name(s) of Product(s) Affected:

Rule Numbers:



Christopher Bowen
Managing Director and Chief Regulatory Counsel
Legal Department

January 15, 2020

VIA ELECTRONIC PORTAL

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

**RE: Implementation of the Eris Swap Futures Block Market Maker Program
CBOT Submission No. 20-071**

Dear Mr. Kirkpatrick:

The Board of Trade of the City of Chicago, Inc. ("CBOT" or "Exchange") hereby notifies the Commodity Futures Trading Commission ("CFTC" or "Commission") of plans to implement the Eris Swap Futures Block Market Maker Program ("Program"). The proposed Program will become effective on February 1, 2020.

Exhibit 1 sets forth the terms of this Program.

The Exchange reviewed the designated contract market core principles ("Core Principles") as set forth in the Commodity Exchange Act ("CEA" or "Act"). During the review, CBOT staff identified the following Core Principles as potentially being impacted: Monitoring of Trading, Execution of Transactions, Protection of Market Participants, Compliance with Rules, and Recordkeeping.

The Program will not impact the Exchange's ability to perform its trade practice and market surveillance obligations under the CEA and the Exchange's market regulation staff will monitor trading in the Program's products to prevent manipulative trading and market abuse. Additionally, the Exchange has implemented systems to track Program participants' obligations to ensure proper distribution of earned incentives. The incentives in the Program do not impact the Exchange's order execution. Participants in the Program will be selected by Exchange staff using criteria as further stated in Exhibit 1. Chapter 4 of the CBOT rules includes prohibitions against fraudulent, non-competitive, unfair or abusive practices. All participants must execute a contractual agreement with the Exchange in which each participant will expressly agree to comply with and be subject to applicable regulations and CBOT rules. The Program is subject to the Exchange's record retention policies which comply with the CEA.

CBOT certifies that the Program complies with the CEA 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>.

If you require any additional information regarding this submission, please e-mail CMEGSubmissionInquiry@cmegroup.com or contact Rachel Johnson at 312-466-4393 or via e-mail at Rachel.Johnson@cmegroup.com. Please reference our CBOT Submission No. 20-071 in any related correspondence.

Sincerely,

/s/ Christopher Bowen
Managing Director and Chief Regulatory Counsel

Attachment: Exhibit 1

EXHIBIT 1

Eris Swap Futures Block Market Maker Program

Program Purpose

The purpose of this Program is to incent participants to build liquidity in the products listed below. A more liquid contract benefits all participant segments in the market.

Product Scope

2-Year Eris Swap Futures (“LIT”), 3-Year Eris Swap Futures (“LIC”), 4-Year Eris Swap Futures (“LID”), 5-Year Eris Swap Futures (“LIW”), 7-Year Eris Swap Futures (“LIB”), 10-Year Eris Swap Futures (“LIY”), 12-Year Eris Swap Futures (“LII”), 15-Year Eris Swap Futures (“LIL”), 20-Year Eris Swap Futures (“LIO”), and 30-Year Eris Swap Futures (“LIE”) (collectively, the “Products”).

Eligible Participants

There is no limit to the number of participants that may participate in the Program. Participants must be CBOT members. Participants must have previously traded CME Swap Futures (either MAC Swap Futures or Eris Swap Futures). In order to participate in the Program, participants must provide the Exchange with block market making contact information for publication on the public market maker directory.

Program Term

Start date is February 1, 2020. End date is December 31, 2021.

Hours

Regular Trading Hours (“RTH”), 6:30AM – 3:30PM CT.

Obligations

In order to be eligible to receive the incentives, participants must meet at least two (2) of the three (3) criteria below during each quarter of 2020.

- (1) Active Block Trading: Participants must have block transactions of at least 500 contracts per quarter during 2020.
- (2) Default Management: Participants must sign up to participate in Default Management for Eris Swap Futures. This must be confirmed in writing or by electronic mail to the Clearing House Risk team at least once per year.
- (3) RFQ Responses: Participants must respond to at least 50% of Globex electronic requests-for-quotes (“RFQs”) for the Products with original tenors of 10-Years or less. A response is defined as a 2-sided quote of at least 250 contracts, no more than \$50 wide at the width and size requirements specified below and provided within 60 seconds of the RFQ. This requirement will apply during RTH, measured quarterly.

Product	Max Width (USD)	Min Size	Time Period
LIT	\$12	250	RTH
LIC	\$16	250	
LID	\$25	100	
LIW	\$30	100	
LIB	\$50	50	
LIY	\$60	50	

Holiday Quoting Schedule: There will be no quoting obligations on the dates listed below. The Holiday Quoting Schedule may be adjusted by the Exchange. Participants will be given notice of any adjustments to the Holiday Quoting Schedule.

Date	Holiday
2/17/2020	Presidents' Day
4/10/2020	Good Friday
5/25/2020	Memorial Day
7/3/2020	Independence Day (Observed)
9/7/2020	Labor Day
10/12/2020	Columbus Day
11/11/2020	Veteran's Day
11/26/2020	Thanksgiving
11/27/2020	Day After Thanksgiving
12/24/2020	Christmas Eve
12/25/2020	Christmas
1/1/2021	New Year's Day
1/18/2021	Birthday of Martin Luther King, Jr.

Incentives

Maintenance Fee Waivers: Upon meeting the obligations per quarter during 2020, as determined by the Exchange, participants will receive maintenance fee waivers for the Products during the current quarter and the following quarter. Participants are eligible to receive maintenance fee waivers through the first quarter of 2021.

Maintenance Fee Discounts: Upon meeting the obligations for at least two (2) quarters during 2020, as determined by the Exchange, participants will receive maintenance fee discounts of 80% through December 31, 2021.

Monitoring

If the Exchange determines that a participant has not met its RFQ Responses obligation during two (2) calendar months over the course of the Program, but is within twenty percent (20%) of the time-in-market obligations, the participant will be eligible to receive the incentives for each applicable month.

If the Exchange determines that a participant has not met its RFQ Responses obligation during one (1) additional calendar month, the participant will be eligible to receive all incentives for that applicable month. Excluding the aforementioned time-in-market leniency, participants must meet the obligations for all subsequent months in order to continue to receive the incentives.