

Via Portal Submission

March 16, 2018

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
Amending OneChicago Rule 210 (Confidentiality and Employee Restrictions)
(OneChicago Submission Number 18-005)

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” or the “Exchange”) hereby submits the following rule amendment that will become effective on April 2, 2018. OneChicago is proposing to amend Rule 210 (Confidentiality and Employee Restrictions) to eliminate the specific trading prohibitions which the exchange had implemented to comply with paragraph (b) of CFTC Regulation 1.59 which was required at that time. Since then, the Commission has exempted designated contract markets from Regulation 1.59(b) and (c) as codified in Regulation 38.2.

* * *

The purpose and effect of the change is to better align OneChicago Rule 210 with CFTC Regulations 1.59 and 38.2. Comments on the rule amendments have not been solicited and none have been received. OneChicago is not aware of any substantive opposing views to these rule amendments. OneChicago certifies that the rule amendments 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 DCMs, and has concluded that the rule change may have some bearing upon the following core principle(s):

Core Principle 12: Core Principle 12 requires establishing and enforcing rules to protect the market and market participants. Updating OneChicago Rule 210 to better comport with CFTC Regulations does not reduce any protections provided to the market and market participants in that the Exchange is maintaining the prohibition against trading on material non-public information.

Core Principle 16: Core Principle 16 calls for establishing and enforcing rules that minimize conflicts of interest and establishing processes for resolving any identified conflicts of interest. This change to Rule 210 maintains the prohibition on the use or disclosure of material non-public information gained through performance of official duties while removing restrictions no longer required under Regulation 1.59 and 38.2.

If you have any questions or comments related to this filing, please feel free to contact me by telephone at (312) 883-3430 or through e-mail at tmccabe@onechicago.com.

Respectfully Submitted,

Thomas G. McCabe

Thomas G. McCabe
Chief Regulatory Officer

Encl: Attachment A

Attachment A

(See Following Page)

210. Confidentiality and Employee Restrictions

(a) No member of the Board or any committee established by the Board or the Rules of the Exchange shall use or disclose any material non-public information, obtained in connection with such member's participation in the Board or such committee, for any purpose other than the performance of his or her official duties as a member of the Board or such committee. At any time, if requested by the Board acting in good faith and in the best interests of the Exchange, an Owner shall surrender to the Exchange any confidential information, and all records, files and other documents provided to the Owner by the Exchange (including all copies thereof) relating to confidential information.

(b) No member of the Board or any committee established by the Board or the Rules of the Exchange, officer, employee or agent of the Exchange shall (i) trade for such person's own account, or for or on behalf of any other account in any commodity interest or security if such member of the Board or any committee established by the Board or the Rules of the Exchange, officer, employee or agent has access to material non-public information concerning such commodity interest or security or (ii) disclose to any other Person material non-public information obtained in connection with such member's of the Board or any committee established by the Board or the Rules of the Exchange, employee's, officer's or agent's official duties, if such member of the Board or any committee established by the Board or the Rules of the Exchange, employee, officer or agent could reasonably expect that such information may assist another Person in trading any commodity interest or security.

~~(c) No Exchange employee shall trade directly or indirectly any futures contract, commodity options or cash commodities traded on the Exchange or any related commodity interest; provided, however, that this rule shall not prohibit an employee from buying or selling Shares of mutual funds or other investment vehicles which may buy or sell the foregoing types of contracts, but only so long as the employee has no control or discretion with respect to the purchase or sale of such contracts.~~

~~(c)~~(d) No Exchange employee shall accept directly or indirectly any gift, gratuity, compensation or any other form of remuneration valued at an amount greater than \$100 annually from any Exchange Member or any Related Party of an Exchange Member without the approval of the Chief Executive Officer.

~~(d)~~(e) For purposes of this Rule 210, the terms "commodity interest," "employee," "material information," "non-public information" and "related commodity interest" shall have the meanings ascribed to them in Commission Regulation § 1.59, and the term "security" shall have the meaning ascribed to it in Section 3(a)(10) of the Exchange Act.