## **OneChicago** ×

Via Portal Submission

October 18, 2017

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

> Re: <u>OneChicago, LLC Rule Submission</u> <u>Amending OneChicago Rules 117 (Clearing Corporation) and 144 (OneChicago</u> <u>Workstation) to Remove References to CME and CBOE</u> (OneChicago Submission Number 17-021)

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, which will become effective on November 1, 2017. OneChicago is proposing to amend OneChicago Rules 117 (Clearing Corporation) and 144 (OneChicago Workstation) to remove references to the Chicago Mercantile Exchange ("CME") and the Chicago Board Options Exchange ("CBOE").

OneChicago Rule 117, which defines the term "Clearing Corporation," refers to The Options Clearing Corporation (the "OCC"), the CME, or such other clearing organization as the Exchange may designate to provide clearing services. At the time Rule 117 was drafted, both the OCC and CME provided clearing services for OneChicago. The Exchange has since terminated its clearing arrangement with the CME, and Rule 117 is being updated to reflect such termination.

The Exchange is similarly updating OneChicago Rule 144, which defines the term "OneChicago Workstation." Currently, Rule 144 defines "OneChicago Workstation" as "any computer connected to the OneChicago System, whether directly (through the application program interface of CBOE or CME, a proprietary network, the internet or otherwise) or indirectly through systems operated by a Clearing Member, in each case for the purpose of trading Contracts." OneChicago is amending the rule to remove references to the CBOE and CME.

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The purpose and effect of the rule amendment is to update the OneChicago Rulebook in accordance with changes made to its relationships with other exchanges. 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 <u>OneChicago website</u>.

OneChicago staff has reviewed the core principles applicable to DCMs, and has concluded that the rule amendment 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 rule amendment supports Core Principle 7 in that it ensures the OneChicago Rulebook accurately describes the rules and specification describing the operation of the contract market.

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 <u>wbarazi@onechicago.com</u>.

Respectfully Submitted,

Maycem Barragi

Waseem Barazi ' Chief Regulatory Officer and Associate General Counsel

Encl: Attachment A

## Attachment A

## **117.** Clearing Corporation

The term "Clearing Corporation" means The Options Clearing Corporation, a Delaware corporation (including its successors), the CME or such other clearing organization or organizations as the Exchange may designate in the future to provide clearing services with respect to any or all of its Contracts. To the extent that the Exchange designates multiple clearing organizations to provide clearing services at any given time, the term "Clearing Corporation" shall refer to the clearing organization or organizations designated to provide such services with respect to the Contract or Clearing Member in question.

## 144. OneChicago Workstation

The term "OneChicago Workstation" means any computer connected to the OneChicago System, whether directly (through the application program interface of CBOE or CME, a proprietary network, the internet or otherwise) or indirectly through systems operated by a Clearing Member, in each case for the purpose of trading Contracts.