

SUBMISSION COVER SHEET

IMPORTANT: Check box if Confidential Treatment is requested

Registered Entity Identifier Code (optional): 14-492

Organization: Chicago Mercantile Exchange Inc. ("CME")

Filing as a: DCM SEF DCO SDR

Please note - only ONE choice allowed.

Filing Date (mm/dd/yy): 11/20/2014 Filing Description: Changes to CDS Product Terms for Acceptance of iTraxx

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: 801

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:

November 20, 2014

VIA ELECTRONIC PORTAL

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

**RE: CFTC Regulation 40.6(a) Certification. Changes to CDS Product Terms for
Acceptance of iTraxx.
CME Submission No. 14-492**

Dear Mr. Kirkpatrick:

Chicago Mercantile Exchange, Inc. ("CME"), a registered derivatives clearing organization ("DCO") under the Commodity Exchange Act, as amended (the "Act"), hereby submits to the Commodity Futures Trading Commission ("CFTC" or "Commission"), pursuant to Regulation 40.6(a), amendments to its existing CDS product rules (the "CDS Product Rules"). The effectiveness of the proposed amendments is to compliment CME's concurrent submission to the Commission pursuant to Commission Rule 39.5(b) (Submission No. 14-491) for the acceptance of certain iTraxx Europe index untranching credit default swap ("CDS") contracts on indices administered by Markit ("iTraxx Contracts") for clearing and addition of associated iTraxx Contract terms and conditions.

The proposed amendments are intended to become effective on December 8, 2014, subject to receiving all regulatory approvals, or on such later date that CME otherwise determines. All capitalized terms not defined herein shall have the meaning given to them in the CDS Product Rules.

I. Description of Proposed Changes

In order to offer clearing of iTraxx Contracts, CME is proposing to amend its existing CDS Product Rules by amending Chapter 801 and its CDS Manual of Operations.

A. Chapter 801 (CDS Contracts)

CME proposes to amend Chapter 801 (CDS Contracts) to include in CME Rule 80103.C. (Eligible CDS) an additional provision which describes when an iTraxx Contract will be eligible for clearing and other conforming, clarification changes and drafting improvements.

B. CDS Manual of Operations

In connection with the proposed amendments to the CDS Product Rules, CME also proposes to make administrative changes to its CDS Manual of Operations in connection with the clearance of iTraxx Contracts. Specifically, amendments have been made where CDX Contracts are described as the only CDS Contracts which CME clears and a deletion has been made to reflect that Restructuring will be a credit event for iTraxx Contracts. Also, a reference which relates to outdated aspects of the CDS Risk Model has been deleted.

II. Core Principle Review

CME reviewed the derivatives clearing organization core principles (“Core Principles”) as set forth in the Act. During the review, CME identified the following Core Principles as potentially being impacted:

- Core Principle C - Participant and Product Eligibility: The revisions to the CDS Product Rules are consistent with the participant and product eligibility requirements of Core Principle C. The changes will adapt CME cleared CDS products to CDS market trading practices which should maximize liquidity by using market standard trading conventions. Additionally, the changes will assist in CME’s and CDS clearing member access to the relevant CDS markets for the purposes of creating, liquidating, transferring and/or auctioning positions.
- Core Principle L – Public Information: The proposed changes to the Chapter 801 CDS Product Rules will be added to the publicly available CME rulebook available on CME’s Website.

Exhibit 1 sets forth the applicable amendments to the CDS Product Rules with additions underscoring and deletions ~~overstruck~~.

Exhibit 2 sets forth the applicable amendments to the CDS Manual of Operations with additions underscoring and deletions ~~overstruck~~. Exhibit 2 is subject to a request for confidential treatment by CME.

CME certifies these changes comply with the Act and regulations thereunder. There were no substantive opposing views to this action.

If you require any additional information regarding this submission, please contact Jennifer Peve at 312-466-7472 or via e-mail at Jennifer.Peve@cmegroup.com, or contact me at 212-299-2228 or Jason.Silverstein@cmegroup.com. Please reference our CME Submission No. 14-492 in any related correspondence.

Sincerely,

/s/ Jason Silverstein
Executive Director & Associate General Counsel

EXHIBIT 1

Amendments to the CDS Product Rules

(Attached Under Separate Cover)

EXHIBIT 2

CDS Manual of Operations

(Designated for Confidential Treatment)