

SUBMISSION COVER SHEET

IMPORTANT: Check box if Confidential Treatment is requested

Registered Entity Identifier Code (optional): 24-002 (2 of 2)

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: 03/21/24 Filing Description: Increase of Better Price or Volume Match ("BPVM") Parameters for the Committed Cross ("C-Cross") Protocol for all CME and CBOT Equity and Cryptocurrency Option Contracts on CME Globex

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: See filing.

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:

March 21, 2024

VIA ELECTRONIC PORTAL

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

Re: CFTC Regulation 40.6(a) Certification. Increase of Better Price or Volume Match (“BPVM”) Parameters for the Committed Cross (“C-Cross”) Protocol for all CME and CBOT Equity and Cryptocurrency Option Contracts on CME Globex. CBOT Submission No. 24-002 (2 of 2)

Dear Mr. Kirkpatrick:

Chicago Mercantile Exchange Inc. (“CME”) and The Board of Trade of the City of Chicago, Inc. (“CBOT”) (collectively the “Exchanges”) certify to the Commodity Futures Trading Commission (“CFTC” or “Commission”) amendments to the CME and CBOT Rule 539.C. Crossing Protocols Table (the “Table”) to increase the Better Price or Volume Match (“BPVM”) parameters for the Committed Cross (“C-Cross”) protocol from 0% to **50%** for all CME and CBOT equity and CME cryptocurrency option contracts as noted in Exhibit B below (collectively, the “Contracts”) for trading on the CME Globex electronic trading platform (“CME Globex”) effective Sunday, April 14, 2024, for trade date of Monday, April 15, 2024 (collectively, the “Rule Amendments”).

The C-Cross pre-execution communication protocol is currently available for CME and CBOT financial options products, including the Contracts. Increasing the BPVM parameter from 0% to 50% for the Contracts will allow market participants to match a percentage of a cross order before interacting with the remainder of orders, provided that certain price improvement conditions are satisfied. Specifically, the C-Cross pre-execution communication protocol improves the current market upon entry and the C-Cross price is equal to or better than the current market at end of the pre-cross period when the cross takes place.

Increasing the BPVM to 50% will encourage additional liquidity provision for market participants seeking access to pricing for instruments in certain circumstances when liquidity challenges may exist. The 50% BPVM parameter will more appropriately incentivize liquidity providers to match buyers and sellers for such instruments.

Based upon feedback from market participants, the Exchanges are implementing the Rule Amendments to provide incentive to facilitate customer trading activity via C-Cross pre-execution communication protocol.

Exhibit A below provides amendments to the Table with additions underscored and deletions ~~struck through~~.

The Exchanges reviewed the designated contract market core principles (“Core Principles”) as set forth in the Commodity Exchange Act (“CEA” or “Act”) and identified that the Rule Amendments may have some bearing on the following Core Principles:

- **Compliance with Rules:** The Table codifies the available crossing protocols for transactions executed pursuant to pre-execution communications under Rule 539.C. (“Pre-Execution

Communications Regarding Globex Trades”) and as such the Rule Amendments are in compliance with this Core Principle.

- **Availability of General Information:** As required by this Core Principle the Exchanges will issue a Special Executive Report (“SER”) and update the Table. The SER and the Table will be posted publicly on CME Group’s website.
- **Execution of Transactions:** Following the Rule Amendments, trading in the Contracts will continue to remain a competitive means of execution on CME Globex based on the algorithm applied by the match engine to the handling of a Request for Cross (“RFC”). Upon entry of the RFC, CME Globex will display an indication that a cross has been committed to the market and will occur in five (5) seconds.

Pursuant to Section 5c(c) of the Act and CFTC Regulation 40.6(a), the Exchanges certify that the Rule Amendments comply with the Act and rules thereunder. There were no substantive opposing views to the proposal.

The Exchanges certify that this submission has been concurrently posted on the Exchanges’ website at <http://www.cmegroup.com/market-regulation/rule-filings.html>.

Should you have any questions concerning the above, please contact the undersigned at (312) 466-7478 or via e-mail at CMEGSubmissionInquiry@cmegroup.com.

Sincerely,

/s/ Timothy Elliott
Managing Director and Chief Regulatory Counsel

Attachments: Exhibit A Amendments to CME and CBOT Rule 539.C. (“Crossing Protocols Table”)
Exhibit B CME Equity and Cryptocurrency Option and CBOT Equity Option Contracts

Exhibit A

**CME and CBOT Rulebooks
Chapter 5
("Trading Qualifications and Practices")
Rule 539.C. ("Pre-Execution Communications Regarding Globex Trades")
Crossing Protocols Table**

Product Class	DCM	Product Subgroup	Committed ("C") Cross	
			Current	Increased
Equities*	CME	Options	0%	<u>50%</u>
Equities	CBOT	Options	0%	<u>50%</u>

* including Cryptocurrencies

Exhibit B

CME Equity and Cryptocurrency Option and CBOT Equity Contracts

CME	
Options on Bitcoin Futures	
Options on Ether Futures	
Monday Weekly Options on Bitcoin Futures – Week 1	
Monday Weekly Options on Bitcoin Futures – Week 2	
Monday Weekly Options on Bitcoin Futures – Week 3	
Monday Weekly Options on Bitcoin Futures – Week 4	
Monday Weekly Options on Bitcoin Futures – Week 5	
Tuesday Weekly Options on Bitcoin Futures – Week 1	
Tuesday Weekly Options on Bitcoin Futures – Week 2	
Tuesday Weekly Options on Bitcoin Futures – Week 3	
Tuesday Weekly Options on Bitcoin Futures – Week 4	
Tuesday Weekly Options on Bitcoin Futures – Week 5	
Wednesday Weekly Options on Bitcoin Futures – Week 1	
Wednesday Weekly Options on Bitcoin Futures – Week 2	
Wednesday Weekly Options on Bitcoin Futures – Week 3	
Wednesday Weekly Options on Bitcoin Futures – Week 4	
Wednesday Weekly Options on Bitcoin Futures – Week 5	
Thursday Weekly Options on Bitcoin Futures – Week 1	
Thursday Weekly Options on Bitcoin Futures – Week 2	
Thursday Weekly Options on Bitcoin Futures – Week 3	
Thursday Weekly Options on Bitcoin Futures – Week 4	
Thursday Weekly Options on Bitcoin Futures – Week 5	
Friday Weekly Options on Bitcoin Futures – Week 1	
Friday Weekly Options on Bitcoin Futures – Week 2	
Friday Weekly Options on Bitcoin Futures – Week 3	
Friday Weekly Options on Bitcoin Futures – Week 4	

Monday Weekly Options on Micro Bitcoin Futures - Week 1
Monday Weekly Options on Micro Bitcoin Futures - Week 2
Monday Weekly Options on Micro Bitcoin Futures - Week 3
Monday Weekly Options on Micro Bitcoin Futures - Week 4
Monday Weekly Options on Micro Bitcoin Futures - Week 5
Tuesday Weekly Options on Micro Bitcoin Futures – Week 1
Tuesday Weekly Options on Micro Bitcoin Futures – Week 2
Tuesday Weekly Options on Micro Bitcoin Futures – Week 3
Tuesday Weekly Options on Micro Bitcoin Futures – Week 4
Tuesday Weekly Options on Micro Bitcoin Futures – Week 5
Wednesday Weekly Options on Micro Bitcoin Futures - Week 1
Wednesday Weekly Options on Micro Bitcoin Futures - Week 2
Wednesday Weekly Options on Micro Bitcoin Futures - Week 3
Wednesday Weekly Options on Micro Bitcoin Futures - Week 4
Wednesday Weekly Options on Micro Bitcoin Futures - Week 5
Thursday Weekly Options on Micro Bitcoin Futures – Week 1
Thursday Weekly Options on Micro Bitcoin Futures – Week 2
Thursday Weekly Options on Micro Bitcoin Futures – Week 3
Thursday Weekly Options on Micro Bitcoin Futures – Week 4
Thursday Weekly Options on Micro Bitcoin Futures – Week 5
Friday Weekly Options on Micro Bitcoin Futures - Week 1
Friday Weekly Options on Micro Bitcoin Futures - Week 2
Friday Weekly Options on Micro Bitcoin Futures - Week 3
Friday Weekly Options on Micro Bitcoin Futures - Week 4
Monthly Options on Micro Bitcoin Futures
Monday Weekly Options on Ether Futures – Week 1
Monday Weekly Options on Ether Futures – Week 2
Monday Weekly Options on Ether Futures – Week 3
Monday Weekly Options on Ether Futures – Week 4
Monday Weekly Options on Ether Futures – Week 5
Tuesday Weekly Options on Ether Futures – Week 1
Tuesday Weekly Options on Ether Futures – Week 2
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Friday Weekly Options on Ether Futures – Week 1
Friday Weekly Options on Ether Futures – Week 2
Friday Weekly Options on Ether Futures – Week 3
Friday Weekly Options on Ether Futures – Week 4
Monday Weekly Options on Micro Ether Futures - Week 1
Monday Weekly Options on Micro Ether Futures - Week 2
Monday Weekly Options on Micro Ether Futures - Week 3
Monday Weekly Options on Micro Ether Futures - Week 4
Monday Weekly Options on Micro Ether Futures - Week 5
Tuesday Weekly Options on Micro Ether Futures – Week 1
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Thursday Weekly Options on Micro Ether Futures – Week 1
Thursday Weekly Options on Micro Ether Futures – Week 2
Thursday Weekly Options on Micro Ether Futures – Week 3
Thursday Weekly Options on Micro Ether Futures – Week 4
Thursday Weekly Options on Micro Ether Futures – Week 5
Friday Weekly Options on Micro Ether Futures - Week 1
Friday Weekly Options on Micro Ether Futures - Week 2
Friday Weekly Options on Micro Ether Futures - Week 3
Friday Weekly Options on Micro Ether Futures - Week 4
Monthly Options on Micro Ether Futures
Options on E-mini Standard & Poor's Midcap 400 Stock Price Index Futures
European Style E-mini® S&P400 Weekly Options
Options on S&P 500® Annual Dividend Index Futures
Options on E-mini S&P Smallcap 600 Stock Price Index Futures
Options on E-mini® Russell 2000® Index Futures
Weekly Options on E-mini® Russell 2000® Index Futures - Week 1
Weekly Options on E-mini® Russell 2000® Index Futures - Week 2
Weekly Options on E-mini® Russell 2000® Index Futures - Week 3
Weekly Options on E-mini® Russell 2000® Index Futures - Week 4
Monday Weekly Options on E-mini® Russell 2000® Index Futures - Week 1 (European-Style)

Monday Weekly Options on E-mini® Russell 2000® Index Futures - Week 2 (European-Style)
Monday Weekly Options on E-mini® Russell 2000® Index Futures - Week 3 (European-Style)
Monday Weekly Options on E-mini® Russell 2000® Index Futures - Week 4 (European-Style)
Monday Weekly Options on E-mini® Russell 2000® Index Futures - Week 5 (European-Style)
Tuesday Weekly Options on E-mini® Russell 2000® Index Futures - Week 1 (European-Style)
Tuesday Weekly Options on E-mini® Russell 2000® Index Futures - Week 2 (European-Style)
Tuesday Weekly Options on E-mini® Russell 2000® Index Futures - Week 3 (European-Style)
Tuesday Weekly Options on E-mini® Russell 2000® Index Futures - Week 4 (European-Style)
Tuesday Weekly Options on E-mini® Russell 2000® Index Futures - Week 5 (European-Style)
Wednesday Weekly Options on E-mini® Russell 2000® Index Futures - Week 1 (European-Style)
Wednesday Weekly Options on E-mini® Russell 2000® Index Futures - Week 2 (European-Style)
Wednesday Weekly Options on E-mini® Russell 2000® Index Futures - Week 3 (European-Style)
Wednesday Weekly Options on E-mini® Russell 2000® Index Futures - Week 4 (European-Style)
Wednesday Weekly Options on E-mini® Russell 2000® Index Futures - Week 5 (European-Style)
Thursday Weekly Options on E-mini® Russell 2000® Index Futures - Week 1 (European-Style)
Thursday Weekly Options on E-mini® Russell 2000® Index Futures - Week 2 (European-Style)
Thursday Weekly Options on E-mini® Russell 2000® Index Futures - Week 3 (European-Style)
Thursday Weekly Options on E-mini® Russell 2000® Index Futures - Week 4 (European-Style)
Thursday Weekly Options on E-mini® Russell 2000® Index Futures - Week 5 (European-Style)
Options on E-mini® Russell 2000® Index Futures - End-of-Month
Quarterly Options on Yen Denominated Nikkei Stock Average Futures
Serial Options on Yen Denominated Nikkei Stock Average Futures
Options on E-mini Standard and Poor's 500 Stock Price Index Futures
Options on E-mini Standard and Poor's 500 Stock Price Index Futures - End-of-Month (European-Style)
Weekly Options on E-mini Standard and Poor's 500 Stock Price Index Futures - Week 1 (European-Style)
Weekly Options on E-mini Standard and Poor's 500 Stock Price Index Futures - Week 2 (European-Style)
Weekly Options on E-mini Standard and Poor's 500 Stock Price Index Futures - Week 3 (European-Style)
Weekly Options on E-mini Standard and Poor's 500 Stock Price Index Futures - Week 4 (European-Style)
Monday Weekly Options on E-mini Standard and Poor's 500 Stock Price Index Futures - Week 1 (European-Style)
Monday Weekly Options on E-mini Standard and Poor's 500 Stock Price Index Futures - Week 2 (European-Style)
Monday Weekly Options on E-mini Standard and Poor's 500 Stock Price Index Futures - Week 3 (European-Style)
Monday Weekly Options on E-mini Standard and Poor's 500 Stock Price Index Futures - Week 4 (European-Style)
Monday Weekly Options on E-mini Standard and Poor's 500 Stock Price Index Futures - Week 5 (European-Style)
Wednesday Weekly Options on E-mini Standard and Poor's 500 Stock Price Index Futures - Week 1 (European-Style)
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Wednesday Weekly Options on E-mini Standard and Poor's 500 Stock Price Index Futures - Week 4 (European-Style)
Wednesday Weekly Options on E-mini Standard and Poor's 500 Stock Price Index Futures - Week 5 (European-Style)

Monday Weekly Options on E-mini Nasdaq-100 Index Futures - Week 4 (European-Style)
Monday Weekly Options on E-mini Nasdaq-100 Index Futures - Week 5 (European-Style)
Wednesday Weekly Options on E-mini Nasdaq-100 Index Futures - Week 1 (European-Style)
Wednesday Weekly Options on E-mini Nasdaq-100 Index Futures - Week 2 (European-Style)
Wednesday Weekly Options on E-mini Nasdaq-100 Index Futures - Week 3 (European-Style)
Wednesday Weekly Options on E-mini Nasdaq-100 Index Futures - Week 4 (European-Style)
Wednesday Weekly Options on E-mini Nasdaq-100 Index Futures - Week 5 (European-Style)
Tuesday Weekly Options on E-mini Nasdaq-100 Index Futures - Week 1 (European-Style)
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Tuesday Weekly Options on E-mini Nasdaq-100 Index Futures - Week 4 (European-Style)
Tuesday Weekly Options on E-mini Nasdaq-100 Index Futures - Week 5 (European-Style)
Thursday Weekly Options on E-mini Nasdaq-100 Index Futures - Week 1 (European-Style)
Thursday Weekly Options on E-mini Nasdaq-100 Index Futures - Week 2 (European-Style)
Thursday Weekly Options on E-mini Nasdaq-100 Index Futures - Week 3 (European-Style)
Thursday Weekly Options on E-mini Nasdaq-100 Index Futures - Week 4 (European-Style)
Thursday Weekly Options on E-mini Nasdaq-100 Index Futures - Week 5 (European-Style)
CBOT
Options on E-mini Dow Jones Industrial Average Index Futures - End-of-Month (European-Style)
Options on E-mini Dow Jones Industrial Average Index Futures
Weekly Options on E-mini Dow Jones Industrial Average Index Futures - Week 1 (European-Style)
Weekly Options on E-mini Dow Jones Industrial Average Index Futures - Week 2 (European-Style)
Weekly Options on E-mini Dow Jones Industrial Average Index Futures - Week 3 (European-Style)
Weekly Options on E-mini Dow Jones Industrial Average Index Futures - Week 4 (European-Style)