



April 18, 2023

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

Re: Cboe Futures Exchange, LLC Product and Rule Certification  
for Options on Cboe<sup>®</sup> iBoxx<sup>®</sup> iShares<sup>®</sup> Bond Index Futures  
Submission Number CFE-2023-006

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (“Act”), and Regulation 40.2 and Regulation 40.6 of the regulations promulgated by the Commodity Futures Trading Commission (“CFTC” or “Commission”) under the Act, Cboe Futures Exchange, LLC (“CFE” or “Exchange”) hereby submits terms and conditions for Options on Cboe<sup>®</sup> iBoxx<sup>®</sup> iShares<sup>®</sup> Bond Index Futures (“Product”) to be traded on CFE and accompanying rule amendments to incorporate the Product into CFE’s rules (“Amendment”).

The Amendment consists of new Chapter 24 of the CFE Rulebook regarding the Product and related revisions to Rule 1502(d) (Position Limits) regarding the position limits for Cboe<sup>®</sup> iBoxx<sup>®</sup> iShares<sup>®</sup> Bond Index futures. A summary Product specifications chart for Options on Cboe<sup>®</sup> iBoxx<sup>®</sup> iShares<sup>®</sup> Bond Index Futures is included in Exhibit 1 to this submission. Exhibit 2 to this submission sets forth the rule changes included in the Amendment.

The terms and conditions for the Product and the Amendment will become effective on May 2, 2023 (“Effective Date”). The Product may be listed for trading on CFE on or after the Effective Date on a date to be announced by the Exchange through the issuance of an Exchange notice.

#### Options on IBHY and IBIG Futures

CFE plans to list options on the following Cboe<sup>®</sup> iBoxx<sup>®</sup> iShares<sup>®</sup> Bond Index futures (“Corporate Bond Index Futures” or “CB Index Futures”) currently listed for trading on CFE: (i) Cboe<sup>®</sup> iBoxx<sup>®</sup> iShares<sup>®</sup> \$ High Yield Corporate Bond Index Futures (“IBHY futures”) and (ii) Cboe<sup>®</sup> iBoxx<sup>®</sup> iShares<sup>®</sup> \$ Investment Grade Corporate Bond Index Futures (“IBIG futures”).

Options on Cboe<sup>®</sup> iBoxx<sup>®</sup> iShares<sup>®</sup> \$ High Yield Corporate Bond Index Futures (“IBHY options”) and Options on Cboe<sup>®</sup> iBoxx<sup>®</sup> iShares<sup>®</sup> \$ Investment Grade Corporate Bond Index Futures (“IBIG options”) are referred to as “Corporate Bond Index Options” or “CB Options”. The Product includes both IBHY options and IBIG options.

#### Index that Underlies IBHY Futures

The iBoxx<sup>®</sup> iShares<sup>®</sup> \$ High Yield Corporate Bond Index (“IBXXIBHY Index”)

underlies IBHY futures. The IBXXIBHY Index provides a measure of the U.S. dollar denominated, sub-investment grade corporate bond market. The IBXXIBHY Index is designed to reflect the performance of U.S. dollar denominated, high yield corporate debt, offering broad coverage of the U.S. dollar denominated, high yield liquid bond universe. As of February 28, 2023, the IBXXIBHY Index included 1,180 constituents and the bonds included in the IBXXIBHY Index had an aggregate outstanding notional amount in excess of \$1.039 trillion. IHS Markit Limited (collectively referred to along with its affiliates in this product and rule certification as “Markit”) owns, compiles, and publishes the IBXXIBHY Index. Markit is a subsidiary of S&P Global Inc., which is a leading provider of transparent and independent ratings, benchmarks, analytics, and data to the capital and commodity markets worldwide.

The IBXXIBHY Index composition is rebalanced once a month on the last business day of the month. The IBXXIBHY Index is rebalanced by comparing the bonds included in the iBoxx<sup>®</sup> \$ High Yield Developed Markets Index (“High Yield Benchmark Index”) and the bonds included in the portfolio of the iShares<sup>®</sup> iBoxx<sup>®</sup> \$ High Yield Corporate Bond ETF (“HYG ETF”). The bonds included in the IBXXIBHY Index on the first business day of the month will generally match the bonds that are in common in both the High Yield Benchmark Index and the portfolio holdings of the HYG ETF as of the last business day of the prior month. Among the types of debt securities that may be included in the IBXXIBHY Index are fixed coupon bonds, step-up bonds, sinking funds or amortizing bonds, medium term notes, Rule 144A offerings, callable bonds, and puttable bonds. Preferred shares, convertible bonds, and bonds with other equity features (such as options or warrants) are among the instrument bond types that are excluded from the IBXXIBHY Index.

The bonds included in the IBXXIBHY Index and the HYG ETF portfolio can differ if the HYG ETF holds bonds not included in the High Yield Benchmark Index. The bonds included in the IBXXIBHY Index and the HYG ETF portfolio also can differ during a month after the first business day of the month if the HYG ETF portfolio changes during the month and can differ on the first business day of the month if the HYG ETF portfolio were to change on the first business day of the month. For example, if a bond in the HYG ETF portfolio is redeemed during a month, the HYG ETF may replace that bond in its portfolio with a different bond during the month whereas the IBXXIBHY Index constituents are only adjusted once a month based on the HYG ETF portfolio constituents that are in common with constituents in the High Yield Benchmark Index on the last business day of the month.

Markit values each of the constituents of the IBXXIBHY Index using a multi-sourced pricing methodology that takes into account transaction data and other data inputs. The weight of a given bond in the IBXXIBHY Index is the market value of the bond divided by the overall market value of the IBXXIBHY Index. The IBXXIBHY Index is calculated as end-of-day and distributed once daily. The IBXXIBHY Index is calculated every weekday except on common U.S. bank holidays. In addition, the IBXXIBHY Index is calculated with the previous trading day’s close on the last calendar day of each month if that day is not a trading day.

The High Yield Benchmark Index represents the performance of a broad coverage of the U.S. dollar denominated, high yield bond universe. Markit owns, compiles, and publishes the High Yield Benchmark Index. There is no limit to the number of issues in the High Yield Benchmark Index. As of February 28, 2023, the High Yield Benchmark Index included 2020 constituents. The bonds eligible for inclusion in the High Yield Benchmark Index include U.S. dollar-denominated corporate bonds that (i) are issued by companies domiciled in countries classified as developed markets by Markit; (ii) have an iBoxx Rating of sub-investment grade; (iii) have at least \$200 million of outstanding face value; (iv) have at least one year to maturity;

and (v) have at least one year and 6 months to maturity for new index insertions. (iBoxx Ratings incorporate ratings from Fitch Ratings, Inc. (“Fitch”), Moody’s Investors Service (“Moody’s”), or S&P Global Ratings. Sub-investment grade bonds include bonds that are not in default rated BB+ or lower by Fitch or S&P Global Ratings and bonds rated Ba1 or lower by Moody’s. If more than one agency provides a rating, the average rating is attached to the bond.)

The HYG ETF seeks to track the investment results of the Markit iBoxx<sup>®</sup> \$ Liquid High Yield Index (“IBOXHY Index”), which is a rules-based index consisting of U.S. dollar-denominated, high yield corporate bonds. Like the IBXXIBHY Index and the High Yield Benchmark Index, Markit owns, compiles, and publishes the IBOXHY Index. The IBOXHY Index is a subset of the High Yield Benchmark Index and is designed to provide a broad representation of the U.S. dollar-denominated, liquid high yield corporate bond market. The IBOXHY Index is a modified market-value weighted index with a cap on each issuer of 3%. There is no limit to the number of issues in the IBOXHY Index. As of February 28, 2023, the IBOXHY Index included 1,166 constituents. The bonds eligible for inclusion in the IBOXHY Index include U.S. dollar-denominated high yield corporate bonds that (i) are issued by companies domiciled in countries classified as developed markets by Markit; (ii) have an average rating of sub-investment grade (where ratings from Fitch, Moody’s, or Standard & Poor’s Global Ratings are considered and the average rating is used if more than one of these credit rating agencies provides a rating); (iii) are from issuers with at least \$1 billion outstanding face value; (iv) have at least \$400 million of outstanding face value; (v) have an original maturity date of 15 years or less; (vi) have at least one year to maturity on the rebalancing date; and (vii) have at least one year and 6 months to maturity for new index insertions.

BlackRock Fund Advisors (“BFA”), the investment advisor to the HYG ETF, uses a representative sampling indexing strategy to manage the HYG ETF. “Representative sampling” is an indexing strategy that involves investing in a representative sample of securities that collectively has an investment profile similar to that of an applicable underlying index. The HYG ETF may or may not hold all of the securities in the IBOXHY Index. The HYG ETF concentrates its investments (i.e., holds 25% or more of its total assets) in a particular industry or group of industries to approximately the same extent that the IBOXHY Index is concentrated. The degree to which these components represent certain industries may change over time.

The HYG ETF invests at least 80% of its assets in the component securities of the IBOXHY Index and invests at least 90% of its assets in fixed income securities of the types included in the IBOXHY Index that BFA believes will help the HYG ETF track the IBOXHY Index. The HYG ETF may invest up to 10% of its assets in futures, options, and swap contracts (and associated cash and cash equivalents) and in fixed income securities not included in the IBOXHY Index which BFA believes will help the HYG ETF track the IBOXHY Index. The HYG ETF seeks to track the investment results of the IBOXHY Index before fees and expenses of the HYG ETF.

Because the components of the IBXXIBHY Index are derived from the intersection of the components of the Benchmark Index and HYG ETF portfolio, CFE generally expects the IBXXIBHY Index to be highly correlated with the net asset value of the HYG ETF. However, the IBXXIBHY Index does differ from the HYG ETF in a number of ways. Among these are that:

- The IBXXIBHY Index value is determined by the value of each of the individual components of the IBXXIBHY Index rather than by the value of a single instrument such as the trade price of the HYG ETF.

- The market value of the HYG ETF is determined by the price of the ETF shares based on supply and demand for the HYG ETF and the market's view of the value of the ETF holdings and the value of IBXXIBHY Index is determined by how Markit values each of the individual constituents within the IBXXIBHY Index.
- The bonds included in the IBXXIBHY Index can differ from the bonds included in the HYG ETF portfolio as further described above.
- The IBXXIBHY Index does not actually hold a portfolio of bonds and therefore does not incur the expenses incurred by the HYG ETF, such as transaction costs.
- The HYG ETF pays out as dividends the redemptions and coupon payments from the bonds it holds whereas the IBXXIBHY Index reinvests the cash from redemptions and coupon payments into the IBXXIBHY Index. Additionally, the cash in the IBXXIBHY Index from coupon payments and redemptions is not reinvested into the IBXXIBHY Index until month end and does not earn interest.
- The HYG ETF can hold assets that are not constituents of the IBXXIBHY Index such as certain futures, options, swap contracts, and securities not included in the IBXXIBHY Index.

Accordingly, CFE views the IBXXIBHY future to be a future on a broad-based securities index rather than a future on an ETF.

Additionally, there are circumstances in which the composition and weights of the IBXXIBHY Index will be revised to the composition and weights of the IBOXHY Index if the bond constituents of the IBXXIBHY and IBOXHY Indexes deviate in excess of certain defined limits. These limits are designed to keep the IBXXIBHY Index within certain risk parameter boundaries of the IBOXHY Index. These limits include if (i) the weight difference in each rating bucket exceeds 5%; (ii) the weight difference in each sector exceeds 5%; (iii) the average duration difference exceeds 1 year; (iv) the average yield difference exceeds 1%; (v) the number of holdings in common is less than 50%; or (vi) the bonds not part of the IBOXHY Index exceed an aggregate weighting of 5% of the IBXXIBHY Index. There may also be disruption events in which Markit may depart from the index methodology for the IBXXIBHY Index in order to obtain a result that preserves the economic intent of the IBXXIBHY Index. For example, Markit may revise the composition and weights of the IBXXIBHY Index to the composition and weights of the IBOXHY Index if the HYG ETF has experienced trading disruptions or ceased trading on the exchange of its primary listing. Additionally, Markit may revise the composition and weights of the IBXXIBHY Index to the composition and weights of the IBOXHY Index if on the last business day of the month Markit is unable to obtain information regarding the portfolio holdings of the HYG ETF needed to determine the IBXXIBHY Index composition.

The above description is intended to be a high level summary of the IBXXIBHY Index, Benchmark Index, HYG ETF, and IBOXHY Index as of the date of this filing. The following materials may be referenced for further information regarding each and the methodology for each:

- IBXXIBHY Index: iBoxx® iShares® \$ High Yield Corporate Bond Index Guide, as of September 2022, which may be accessed at <https://www.markit.com/Company/Files/DownloadFiles?CMSID=5ba7a39a6588457>

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- High Yield Benchmark Index: iBoxx<sup>®</sup> USD High Yield Developed Markets Index Guide, as of November 2022, which may be accessed at <https://www.markit.com/Company/Files/DownloadFiles?CMSID=2493698484d74daa93057712fbc803b0;>
- HYG ETF: Prospectus for iShares<sup>®</sup> iBoxx<sup>®</sup> \$ High Yield Corporate Bond ETF, as of June 29, 2022, which may be accessed at [https://www.ishares.com/us/library/stream-document?stream=reg&product=ISHHYLD&shareClass=NA&documentId=925985%7E925960%7E926213%7E925660%7E925574&iFrameUrlOverride=%2Fus%2Fliterature%2Fprospectus%2Fp-ishares-iboxx-high-yield-corporate-bond-etf-2-28.pdf;](https://www.ishares.com/us/library/stream-document?stream=reg&product=ISHHYLD&shareClass=NA&documentId=925985%7E925960%7E926213%7E925660%7E925574&iFrameUrlOverride=%2Fus%2Fliterature%2Fprospectus%2Fp-ishares-iboxx-high-yield-corporate-bond-etf-2-28.pdf) and
- IBOXHY Index: Markit iBoxx<sup>®</sup> \$ Liquid High Yield Index Guide, as of April 2023, which may be accessed at [https://www.markit.com/Company/Files/DownloadFiles?CMSID=a465fc109c634a3891b9f53d1a605586.](https://www.markit.com/Company/Files/DownloadFiles?CMSID=a465fc109c634a3891b9f53d1a605586)

The IBXXIBHY Index, High Yield Benchmark Index, HYG ETF, and IBOXHY Index, the above information regarding each, and the above-referenced documents regarding each may change over time.

#### Index that Underlies IBIG Futures

The iBoxx<sup>®</sup> iShares<sup>®</sup> \$ Investment Grade Corporate Bond Index (“IBXXIBIG Index”) underlies IBIG futures. The IBXXIBIG Index provides a measure of the U.S. dollar denominated, investment grade corporate bond market. The IBXXIBIG Index is designed to reflect the performance of U.S. dollar denominated, investment grade corporate debt, offering broad coverage of the U.S. dollar denominated, investment grade liquid bond universe. As of February 28, 2023, the IBXXIBIG Index included 2,566 constituents and the bonds included in the IBXXIBIG Index had an aggregate outstanding notional amount in excess of \$3.644 trillion. Markit owns, compiles, and publishes the IBXXIBIG Index.

The IBXXIBIG Index composition is rebalanced once a month on the last business day of the month. The IBXXIBIG Index is rebalanced by comparing the bonds included in the Markit iBoxx<sup>®</sup> USD Benchmark Index (“Investment Grade Benchmark Index”) and the bonds included in the portfolio of the iShares<sup>®</sup> iBoxx<sup>®</sup> \$ Investment Grade Corporate Bond ETF (“LQD ETF”). The bonds included in the IBXXIBIG Index on the first business day of the month will generally match the bonds that are in common in both the Investment Grade Benchmark Index and the portfolio holdings of the LQD ETF as of the last business day of the prior month. Among the types of debt securities that may be included in the IBXXIBIG Index are fixed coupon bonds, callable bonds, puttable bonds, step-up bonds, amortizing bonds or sinking funds, and secured bonds. Convertible bonds and bonds with other equity features are among the instrument bond types that are excluded from the IBXXIBIG Index.

The bonds included in the IBXXIBIG Index and the LQD ETF portfolio can differ if the LQD ETF holds bonds not included in the Investment Grade Benchmark Index. The bonds included in the IBXXIBIG Index and the LQD ETF portfolio also can differ during a month after the first business day of the month if the LQD ETF portfolio changes during the month and can differ on the first business day of the month if the LQD ETF portfolio were to change on the first

business day of the month. For example, if a bond in the LQD ETF portfolio is redeemed during a month, the LQD ETF may replace that bond in its portfolio with a different bond during the month whereas the IBXXIBIG Index constituents are only adjusted once a month based on the LQD ETF portfolio constituents that are in common with constituents in the Investment Grade Benchmark Index on the last business day of the month.

Markit values each of the constituents of the IBXXIBIG Index using a multi-sourced pricing methodology that takes into account transaction data and other data inputs. The weight of a given bond in the IBXXIBIG Index is the market value of the bond divided by the overall market value of the IBXXIBIG Index. The IBXXIBIG Index is calculated as end-of-day and distributed once daily. The IBXXIBIG Index is calculated every weekday except on common U.S. bank holidays. In addition, the IBXXIBIG Index is calculated with the previous trading day's close on the last calendar day of each month if that day is not a trading day.

The Investment Grade Benchmark Index represents the performance of a broad coverage of the U.S. dollar denominated, investment grade bond universe. Markit owns, compiles, and publishes the Investment Grade Benchmark Index. There is no limit to the number of issues in the Investment Grade Benchmark Index. As of February 28, 2023, the Investment Grade Benchmark Index included 7,526 constituents. The bonds eligible for inclusion in the Investment Grade Benchmark Index include U.S. dollar-denominated corporate bonds that (i) have an iBoxx Rating of investment grade; (ii) have at least \$500 million of outstanding face value; (v) have at least one year to maturity on the rebalancing date; and (vi) have at least 18 months to maturity for new index insertions. (An iBoxx Rating of investment grade applies to bonds rated BBB- or higher by Fitch and S&P Global Ratings and bonds rated Baa3 or higher by Moody's. If more than one agency provides a rating, the average rating is attached to the bond.)

The LQD ETF seeks to track the investment results of the Markit iBoxx<sup>®</sup> USD Liquid Investment Grade Index ("IBOXIG Index"), which is a rules-based index consisting of U.S. dollar-denominated, investment grade corporate bonds. Like the IBXXIBIG Index and the Investment Grade Benchmark Index, Markit owns, compiles, and publishes the IBOXIG Index. The IBOXIG Index is designed to provide a broad representation of the U.S. dollar-denominated, liquid investment grade corporate bond market. The IBOXIG Index is a modified market-value weighted index with a cap on each issuer of 3%. There is no limit to the number of issues in the IBOXIG Index. As of February 28, 2023, the IBOXIG Index included 2,547 constituents. The bonds eligible for inclusion in the IBOXIG Index include U.S. dollar-denominated corporate bonds that (i) are issued by companies domiciled in countries classified as developed markets by Markit; (ii) have an average rating of investment grade (where ratings from Fitch, Moody's, or Standard & Poor's Global Ratings are considered and the average rating is used if more than one of these credit rating agencies provides a rating); (iii) are from issuers with at least \$2 billion outstanding face value; (iv) have at least \$750 million of outstanding face value; (v) have at least three years to maturity; and (vi) have at least three years and 6 months to maturity for new index insertions.

BFA, the investment advisor to the LQD ETF, uses a representative sampling indexing strategy to manage the LQD ETF. The LQD ETF may or may not hold all of the securities in the IBOXIG Index. The LQD ETF concentrates its investments (i.e., holds 25% or more of its total assets) in a particular industry or group of industries to approximately the same extent that the IBOXIG Index is concentrated. The degree to which these components represent certain industries may change over time.

The LQD ETF invests at least 80% of its assets in the component securities of the

IBOXIG Index and invests at least 90% of its assets in fixed income securities of the types included in the IBOXIG Index that BFA believes will help the LQD ETF track the IBOXIG Index. The LQD ETF may invest up to 10% of its assets in futures, options, and swap contracts (and associated cash and cash equivalents) and in fixed income securities not included in the IBOXIG Index which BFA believes will help the LQD ETF track the IBOXIG Index. The LQD ETF seeks to track the investment results of the IBOXIG Index before fees and expenses of the LQD ETF.

Because the components of the IBXXIBIG Index are derived from the intersection of the components of the Benchmark Index and LQD ETF portfolio, CFE generally expects the IBXXIBIG Index to be highly correlated with the net asset value of the LQD ETF. However, the IBXXIBIG Index does differ from the LQD ETF in a number of ways. Among these are that:

- The IBXXIBIG Index value is determined by the value of each of the individual components of the IBXXIBIG Index rather than by the value of a single instrument such as the trade price of the LQD ETF.
- The market value of the LQD ETF is determined by the price of the ETF shares based on supply and demand for the LQD ETF and the market's view of the value of the ETF holdings and the value of IBXXIBIG Index is determined by how Market values each of the individual constituents within the IBXXIBIG Index.
- The bonds included in the IBXXIBIG Index can differ from the bonds included in the LQD ETF portfolio as further described above.
- The IBXXIBIG Index does not actually hold a portfolio of bonds and therefore does not incur the expenses incurred by the LQD ETF, such as transaction costs.
- The LQD ETF pays out as dividends the redemptions and coupon payments from the bonds it holds whereas the IBXXIBIG Index reinvests the cash from redemptions and coupon payments into the IBXXIBIG Index. Additionally, the cash in the IBXXIBIG Index from coupon payments and redemptions is not reinvested into the IBXXIBIG Index until month end and does not earn interest.
- The LQD ETF can hold assets that are not constituents of the IBXXIBIG Index such as certain futures, options, swap contracts, and securities not included in the IBXXIBIG Index.

Accordingly, CFE views the IBIG future to be a future on a broad-based securities index rather than a future on an ETF.

Additionally, there are circumstances in which the composition and weights of the IBXXIBIG Index will be revised to the composition and weights of the IBOXIG Index if the bond constituents of the IBXXIBIG and IBOXIG Indexes deviate in excess of certain defined limits. These limits are designed to keep the IBXXIBIG Index within certain risk parameter boundaries of the IBOXIG Index. These limits include if (i) the weight difference in each rating bucket exceeds 5%; (ii) the weight difference in each sector exceeds 5%; (iii) the average duration difference exceeds 1 year; (iv) the average yield difference exceeds 1%; (v) the number of holdings in common is less than 50%; or (vi) the bonds not part of the IBOXIG Index exceed an aggregate weighting of 5% of the IBXXIBIG Index. There may also be disruption events in

which Markit may depart from the index methodology for the IBXXIBIG Index in order to obtain a result that preserves the economic intent of the IBXXIBIG Index. For example, Markit may revise the composition and weights of the IBXXIBIG Index to the composition and weights of the IBOXIG Index if the LQD ETF has experienced trading disruptions or ceased trading on the exchange of its primary listing. Additionally, Markit may revise the composition and weights of the IBXXIBIG Index to the composition and weights of the IBOXIG Index if on the last business day of the month Markit is unable to obtain information regarding the portfolio holdings of the LQD ETF needed to determine the IBXXIBIG Index composition.

The above description is intended to be a high level summary of the IBXXIBIG Index, Benchmark Index, LQD ETF, and IBOXIG Index as of the date of this filing. The following materials may be referenced for further information regarding each and the methodology for each:

- IBXXIBIG Index: iBoxx<sup>®</sup> iShares<sup>®</sup> \$ Investment Grade Corporate Bond Index Guide, as of September 2022, which may be accessed at <https://www.markit.com/Company/Files/DownloadFiles?CMSID=6be964372fde4ea0ada537cb63555e88>;
- Investment Grade Benchmark Index: Markit iBoxx<sup>®</sup> USD Benchmark Index Guide, as of September 2022, which may be accessed at <https://www.markit.com/Company/Files/DownloadFiles?CMSID=94e6f2b10faa4f5ca6b3b54294ba4449>;
- LQD ETF: Prospectus for iShares<sup>®</sup> iBoxx<sup>®</sup> \$ Investment Grade Corporate Bond ETF, as of June 29, 2022, which may be accessed at <https://www.ishares.com/us/library/stream-document?stream=reg&product=ISHINTOP&shareClass=NA&documentId=925919%7E925978%7E926213%7E925660%7E925574&iFrameUrlOverride=%2Fus%2Fliterature%2Fprospectus%2Fp-ishares-iboxx-investment-grade-corporate-bond-etf-2-28.pdf>; and
- IBOXIG Index: Markit iBoxx<sup>®</sup> USD Liquid Investment Grade Index Guide, as of April 2023, which may be accessed at <https://www.markit.com/Company/Files/DownloadFiles?CMSID=d3b16e8a26e84f6e84560a0a4535889a>.

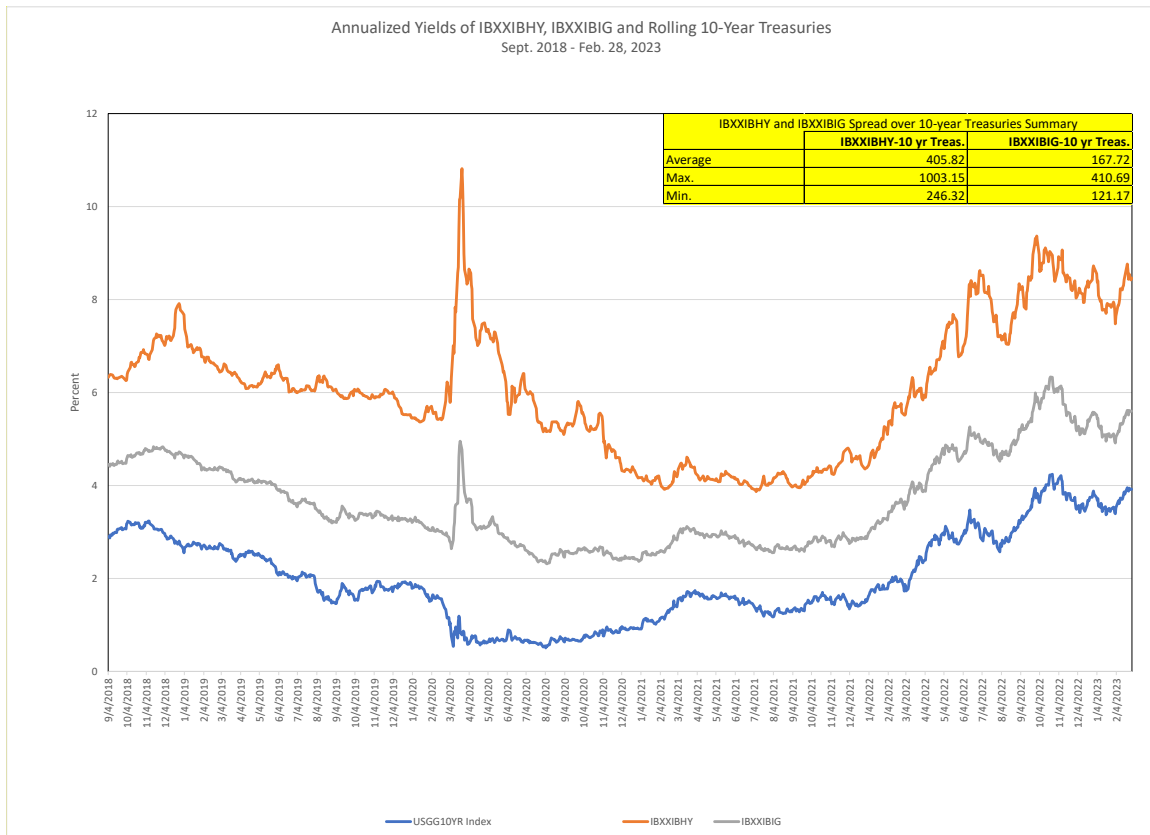
The IBXXIBIG Index, Investment Grade Benchmark Index, LQD ETF, and IBOXIG Index, the above information regarding each, and the above-referenced documents regarding each may change over time.

#### Underlying Index Levels Compared to Levels of Other Benchmarks

The graph below reflects the annualized yields of the IBXXIBHY Index and the IBXXIBIG Index in relation to annualized yields of 10-year U.S. Treasury Notes from September 2018 (the month during which IBHY futures and IBIG futures were first offered for trading) through February 2023. During that time period: (i) the average spread between the annualized yield of the IBXXIBHY Index and the annualized yield of IBXXIBIG Index was 238 basis points; (ii) the average spread between the annualized yield of the IBXXIBHY Index and the annualized yield of 10-year U.S. Treasury Notes was 406 basis points; and (iii) the average

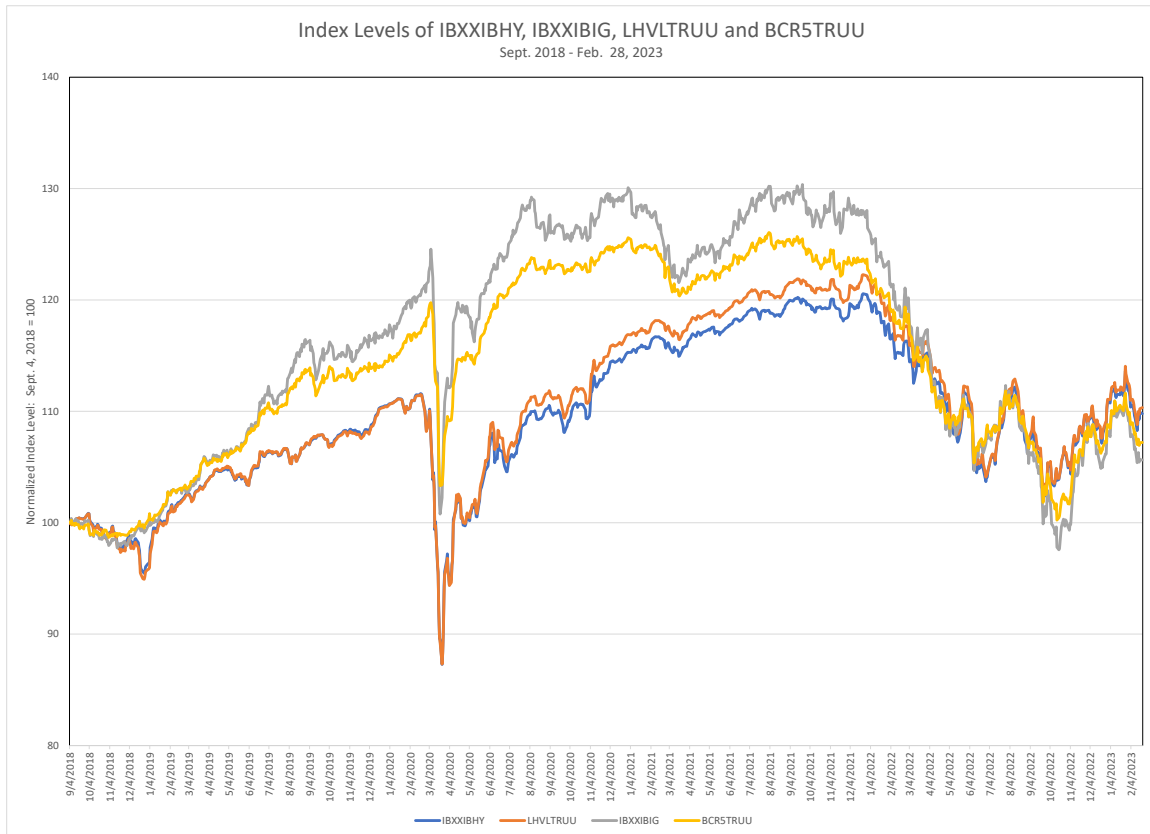


spread between the annualized yield of the IBXXIBIG Index and the annualized yield of 10-year U.S. Treasury Notes was 168 basis points. These average spreads reflect varying levels of credit risk applicable to 10-year U.S. Treasury Notes (which are issued by the U.S. government), the IBXXIBIG Index (which includes a credit component related to investment grade corporate bonds), and the IBXXIBHY Index (which includes a credit component related to high yield corporate bonds).



The graph below reflects normalized index levels of the IBXXIBHY Index and the IBXXIBIG Index in relation to normalized index levels of the Bloomberg High Yield Very Liquid Index (“LHVLTRUU Index”) (another high yield corporate bond index) and the Bloomberg U.S. 5-10 Year Corporate Bond Index (“BCR5TRUU Index”) (another investment grade corporate bond index) from September 2018 through February 2023. The LHVLTRUU Index is designed to measure the performance of publicly issued U.S. dollar denominated high yield corporate bonds with above-average liquidity. The LHVLTRUU Index is the benchmark index for the SPDR® Bloomberg High Yield Bond ETF (“JNK ETF”) which seeks to provide investment results that, before fees and expenses, correspond generally to the price and yield performance of the LHVLTRUU Index. The BCR5TRUU Index measures the investment return of U.S. dollar denominated, investment grade, fixed rate, taxable securities issued by industrial, utility, and financial companies with maturities between 5 and 10 years. The BCR5TRUU Index is the benchmark index for the Vanguard Intermediate-Term Corporate Bond ETF (“VCIT ETF”) which seeks to track the performance of the BCR5TRUU Index. During the time period from September 2018 through February 2023: (i) the average spread between the normalized index level of the IBXXIBHY Index and the normalized index level of the LHVLTRUU Index was -0.68 points; (ii) the average spread between the normalized index level of the IBXXIBHY Index and the normalized index level of the BCR5TRUU Index was 1.73 points; (iii) the daily

return correlation between the IBXXIBHY Index and the LHVLTRUU Index was 0.987; and (iv) the daily return correlation between the IBXXIBIG Index and the BCR5TRUU Index was 0.957.



### IBHY and IBIG Futures

IBHY options are options on IBHY futures. IBHY futures are cash-settled futures on the IBXXIBHY Index. IBHY futures are listed for trading on CFE and are cleared by The Options Clearing Corporation (“OCC”). IBHY futures have been offered for trading on CFE since September 10, 2018.

IBIG options are options on IBIG futures. IBIG futures are cash-settled futures on the IBXXIBIG Index. IBIG futures are listed for trading on CFE and are cleared by OCC. IBIG futures have been offered for trading on CFE since September 28, 2018.

A robust and liquid market has developed in IBHY and IBIG futures since their launch.

During the time period from September 2018 through February 28, 2023:

- 371 accounts have traded IBHY futures, and 113 accounts have traded IBIG futures.
- \$102,579,519,830 in notional value has been traded in IBHY futures, and \$44,260,229,300 in notional value has been traded in IBIG futures.
- The average daily trading volume in IBHY futures was 661 contracts per day representing an average daily trading value of \$93,594,452 in notional terms. The

average daily trading volume in IBIG futures was 428 contracts per day representing an average daily trading value of \$59,330,066 in notional terms.

- The average daily open interest in IBHY futures was 620 contracts per day, and the average daily open interest in IBIG futures was 192 contracts per day. Additionally, the highest level of daily open interest in IBHY futures during the time period from September 2018 through February 2023 was on April 27, 2021, with an open interest level of 2,129 contracts. The highest level of daily option interest in IBIG futures during that time period was on July 27, 2022, with an open interest level of 943 contracts.

Average daily trading volume and average daily open interest in IBHY and IBIG futures increased more recently during 2022.

- During the time period from January 2022 through December 2022, the average daily trading volume in IBHY futures was 1,103 contracts per day representing an average daily trading value of \$152,725,559 in notional terms. During that same time period, the average daily trading volume in IBIG futures was 559 contracts per day representing an average daily trading value of \$71,894,797 in notional terms.
- During the time period from January 2022 through December 2022, the average daily open interest in IBHY futures was 833 contracts per day and the average daily open interest in IBIG futures was 505 contracts per day.

There has been a period of adjustment in the market for IBHY and IBIG futures during the early part of 2023 in connection with the implementation of new lead market maker (“LMM”) programs in these products at the beginning of 2023. Although trading volume has initially declined during this time frame, there has been improvement in the overall quality of the market in these products. During January through February 2023, the average daily trading volume in IBHY futures was 296 contracts per day and the average daily trading volume in IBIG futures was 261 contracts per day. However, the market quality in IBHY and IBIG futures improved in other ways during that time period.

- The average daily open interest in IBHY futures was 723 contracts per day during the time period from January through February 2023 and ended the period on February 28, 2023 at 1,073 contracts. The average daily open interest in IBIG futures was 592 contracts per day during the time period from January through February 2023 and ended the period on February 28, 2023 at 607 contracts.
- The average bid-ask spread at the top of the market for the front month IBHY futures contract improved from \$0.10 wide during 2022 to \$0.07 wide from January through February 2023. Similarly, the average bid-ask spread at the top of the market for the front month IBIG futures contract improved from \$0.12 wide during 2022 to \$0.07 wide from January through February 2023.
- The average bid-ask size at the top of the market for the front month IBHY futures contract increased from 5 x 8 contracts during 2022 to 14 x 15 contracts from January through February 2023. Similarly, the average bid-ask size at the top of the market for the front month IBIG futures contract increased from 5 x 7 contracts during 2022 to 13 x 14 contracts from January through February 2023.

- Three LMMs cumulatively provided proprietary orders in IBHY and IBIG futures at least 97% of the time during January through February 2023 with a maximum quote width of \$0.10 wide and a minimum quote size of 30 x 30 contracts.
- The percentage of customer trading volume in IBHY and IBIG futures increased from 6% during 2022 to 17% in IBHY futures and to 15% in IBIG futures from January through February 2023.

The robustness and level of liquidity in the market for IBHY and IBIG futures is also demonstrated by the ability of the market to handle higher trading volumes during periods of high demand for trading in IBHY and IBIG futures. For example:

- On the highest volume trading day for IBHY futures on January 27, 2021, 6,733 IBHY futures contracts were traded representing \$979,642,060 in notional value. On the highest volume trading day for IBIG futures on May 20, 2021, 2,476 contracts were traded representing \$358,501,040 in notional value.
- During the highest volume trading month for IBHY futures during July 2021, 39,919 IBHY futures contracts were traded representing \$5,986,731,360 in notional value (with an average daily trading volume of 1,901 contracts per day and an average daily trading value of \$285,082,446 in notional terms). During the highest volume trading month for IBIG futures during May 2021, 22,437 IBIG futures contracts were traded representing \$3,250,136,570 in notional value (with an average daily trading volume of 1,181 contracts per day and an average daily trading value of \$162,506,829 in notional terms).
- The significant level of trading volume during these periods is further demonstrated by comparing the notional value traded in IBHY futures and the HYG ETF during these time frames and doing the same for IBIG futures and the LQD ETF. For reference, the HYG ETF was ranked 9th and the LQD ETF was ranked 25th in highest level of trading volume among all U.S. registered exchange-traded funds (“ETFs”) during the time period from November 2021 through October 2022.
  - The notional value traded in IBHY futures on its highest volume trading day on January 27, 2021 was 24.30% of the notional value traded in the HYG ETF on that trading day, and the notional value traded in IBHY futures during its highest volume trading month in July 2021 was 15.75% of the notional value traded in the HYG ETF during that trading month.
  - The notional value traded in IBIG futures on its highest volume trading day on May 20, 2021 was 26.04% of the notional value traded in the LQD ETF on that trading day, and the notional value traded in IBIG futures during its highest volume trading month in May 2021 was 10.80% of the notional value traded in the LQD ETF during that trading month.

#### Contract Specifications

As further described in the attached summary product specifications chart for CB Options and in new Chapter 24 of the CFE Rulebook, the contract specifications for CB Options include the following:

All of the CB Options on contract expirations of a particular CB Index Future are treated as a separate product. Accordingly, although IBHY options and IBIG options will be governed by the same provisions within the same rule chapter, they will each be treated as separate products under that rule chapter.

CB Options have American-style exercise, are physically settled, and have P.M. settlement. A specific CB Index Futures contract underlies each CB Options contract. The exercise of a CB Options contract results in the delivery of one underlying CB Index Futures contract. The CB Index Futures contract that underlies a CB Options contract is the CB Index Futures contract that has the same expiration date as the CB Options contract. As a result, on the expiration date of a CB Options contract, the CB Options contract is settled into the underlying CB Index Futures contract and the underlying CB Index Futures contract is then settled into cash in accordance with the Rules and By-Laws of OCC.

CFE may list for trading CB Option calls and puts on up to four near-term serial months (“serial” contracts) and four months on the March quarterly cycle (“quarterly” contracts) of each CB Index Futures product. CFE may initially list in, at, and/or out-of-the money exercise (strike) prices and may add new exercise (strike) prices for CB Options as it deems appropriate, including in response to market conditions. The minimum exercise (strike) price interval for CB Options is 0.25 index points.

The trading hours for CB Options are on business days Monday through Friday from 8:30 a.m. to 3:00 p.m. Chicago time. Trading hours in an expiring CB Options contract end at 3:00 p.m. Chicago time on its expiration date.

The expiration date of a CB Options contract is the final settlement date of the CB Index Futures contract that underlies the CB Options contract. The final settlement date for “serial” and “quarterly” CB Index Futures is generally the first business day of the calendar month denoted by the ticker symbol for the contract.

CB Options have American-style exercise. A CB Option may be exercised on any OCC business day up to and including the OCC business day prior to its expiration date in accordance with the Rules and By-Laws of OCC. Subject to the Rules and By-Laws of OCC, a CB Option that is in-the-money by \$0.01 or more upon its expiration is automatically exercised on its expiration date and contrary exercise instructions are not permitted.

The exercise settlement value of an expiring CB Options contract is the closing index value of the applicable CB Index on the expiration date of the CB Options contract as determined by Markit. The exercise settlement value is rounded to the nearest \$0.01. For example, the exercise settlement value of an expiring IBHY options contract is the closing index value as determined by Markit of the IBXXIBHY Index on the expiration date of the IBHY options contract. Like with the final settlement values of CFE futures products, CFE rules for CB Options provide that if the exercise settlement value is not available or the normal settlement procedure cannot be utilized due to a trading disruption or other unusual circumstance, the exercise settlement value will be determined in accordance with the Rules and By-Laws of OCC.

The daily settlement price for a CB Options contract on each business day other than the expiration date of the CB Options contract is determined by CFE by utilizing a Cox-Ross-Rubinstein binomial tree model to derive the theoretical option price for that contract utilizing its theoretical volatility. CFE may in its sole discretion establish a daily settlement price for a CB Options contract that it deems to be a fair and reasonable reflection of the market if (i) a

calculation of the theoretical option price for the CB Options contract calculated as described above is not available for use in determining the daily settlement price of the CB Options contract due to a system issue or other reason; (ii) CFE determines in its sole discretion that the theoretical option price for the CB Options contract calculated as described above is not a fair and reasonable reflection of the market; or (iii) there is a trading halt in the CB Options contract or other unusual circumstance at or around the scheduled close of trading hours for the CB Options contract on the applicable business day.

The allocation method for the trading of CB Options on CFE's trading system is price-time priority.

CB Options prices are stated in index points and decimal format. The minimum increment for single leg prices, the individual legs of spreads, and the net prices of spreads in CB Options is 0.01 index points (equal to a dollar value per minimum increment of \$10.00 per contract).

Market Orders are not permitted in CB Options.

Block Trades are permitted in CB Options provided that they satisfy the requirements of CFE Rule 415 (Block Trades). The minimum Block Trade quantity for CB Options is 50 contracts if there is only one leg involved in the trade. If the Block Trade is executed as a spread transaction with multiple legs, each leg must meet the minimum Block Trade quantity for CB Options. The minimum price increment for Block Trades in CB Options is 0.005 index points.

Exchange of Contract for Related Position ("ECRP") transactions are not permitted in CB Options.

Like other equity-related products, CB Options are subject to market-wide circuit breaker trading halt provisions under CFE Rule 417A (Market-Wide Trading Halts Due to Extraordinary Market Volatility). Rule 417A provides that CFE will halt trading in all CFE contracts subject to Rule 417A and not reopen trading in those contracts for specified time frames if there is a Level 1 (7%), Level 2 (13%), or Level 3 (20%) Market Decline. A Market Decline is a decline in the price of the S&P 500 Index between 8:30 a.m. and 3:00 p.m. Chicago time on a trading day as compared to the closing price of the S&P 500 Index for the immediately preceding trading day.

CFE will also halt trading in a CB Options product during any trading halt in the CB Index Futures product which underlies that CB Options product.

#### Potential Uses of IBHY and IBIG Options

CFE believes that CB Options could be used by a number of different groups for commercial purposes and thus serve a legitimate economic purpose. Among the groups that may find CB Options to be useful in connection with their investment and trading activities are insurance companies; pensions, endowments, and fixed income accounts; Commodity Trading Advisors ("CTAs"); proprietary trading firms; ETF Authorized Participants; asset managers; and new credit market entrants. For example: Insurance companies with large bond portfolios may find CB Options useful for hedging and/or asset allocation and may find CB Options to be less capital-intensive than trading the HYG ETF or LQD ETF. Pensions, endowments, and fixed income accounts with large bond portfolios that are not permitted by their mandate to hold equities may also find CB Options to be useful for hedging and/or asset allocation. CTAs and proprietary trading firms may find CB Options to be a vehicle for implementing trading strategies

related to corporate bonds and CB Index Futures. Proprietary trading firms and ETF Authorized Participants that have the ability to create and redeem ETF shares may also find CB Options to be useful for hedging exposure to the CB Index Futures and the HYG ETF and LQD ETF. Asset managers may find CB Options to be useful for hedging credit risk or interest rate risk of corporate bond holdings and for hedging exposure to CB Index Futures. New credit market entrants, such as volatility funds, may find it useful to engage in trading and hedging strategies utilizing CB Options that they use in trading other derivatives, such as equity volatility index derivatives.

### Legal Conditions

CFE believes that the IBXXIBHY Index and IBXXIBIG Index each qualify as a broad-based security index under Section 1a(35)(B)(vi) of the Act which provides that:

(B) Notwithstanding [Section 1a(35)(A) of the Act], an index is not a narrow-based security index if — . . . (vi) a contract of sale for future delivery on the index is traded on or subject to the rules of a board of trade and meets such requirements as are jointly established by rule, regulation, or order by the Commission and the Securities and Exchange Commission.

In particular, CFE believes that the IBXXIBHY Index and IBXXIBIG Index each qualify as a broad-based security index composed of debt securities and that the IBXXIBHY Index and IBXXIBIG Index each satisfies the exclusion from the definition of a narrow-based security index for indexes composed of debt securities pursuant to CFTC Regulation 41.15 (Exclusion from definition of narrow-based security index for indexes composed of debt securities) and Securities and Exchange Commission (“SEC”) Rule 3a55-4 (Exclusion from definition of narrow-based security index for indexes composed of debt securities).

CFE believes that Section 1a(35)(B)(vi) of the Act applies in relation to the IBXXIBHY Index and IBXXIBIG Index since CFE is a board of trade that offers futures on the IBXXIBHY and IBXXIBIG Indexes for trading on CFE subject to CFE rules. Additionally, CFE believes that the IBXXIBHY Index and IBXXIBIG Index each satisfy the requirements under CFTC Regulation 41.15 and SEC Rule 3a55-4. This CFTC regulation and SEC rule contain equivalent provisions and were jointly adopted by the CFTC and the SEC to exclude from the definition of a narrow-based security index under the Act and the Securities Exchange Act of 1934, as amended (“Exchange Act”), any debt securities index which satisfies the criteria under CFTC Regulation 41.15 and SEC Rule 3a55-4. (See Joint Final Rules: Application of the Definition of Narrow-Based Security Index to Debt Securities Indexes and Security Futures on Debt Securities; Release No. 34-54106; File No. S7-07-06; 71 FR 39534 (July 13, 2006)).

CFE has provided to the Commission a segregated confidential Appendix A to this submission with more detailed information regarding the manner in which CFE believes that the IBXXIBHY Index and IBXXIBIG Index satisfy the exclusion from the definition of a narrow-based security index for indexes composed of debt securities pursuant to CFTC Regulation 41.15.

Markit has granted a license to Cboe Exchange, Inc. (“Cboe Options”) and its affiliated exchanges, including CFE, which permits CFE to list IBHY options and IBIG options for trading. CFE has undertaken a due diligence review of the legal conditions, including conditions that relate to contractual and intellectual property rights, which may materially affect the trading of the Product.

## DCM Core Principles

CFE believes that the Product and Amendment are consistent with the Designated Contract Market (“DCM”) Core Principles under Section 5 of the Act, including for the reasons described below. In particular, CFE believes that the Amendment is consistent with:

(i) DCM Core Principle 2 (Compliance with Rules) because CFE rules include prohibitions against market manipulation and fraudulent, non-competitive, and disruptive trading practices that will apply to trading activity in the CB Options and CFE will conduct monitoring and surveillance of trading in the CB Options for compliance with CFE rules;

(ii) DCM Core Principle 3 (Contracts Not Readily Susceptible to Manipulation) because, among other things:

(1) The test under CFTC Regulation 41.15 for the exclusion from the definition of narrow-based security index for debt security indexes includes satisfaction of requirements relating to, among other things, minimum number of constituents, maximum weighting and concentration of securities of an issuer, eligibility conditions for issuers, minimum remaining outstanding principal amount of issuers, and public availability of information about issuers. CFE believes that the IBXXIBHY Index and IBXXIBIG Index satisfy this test and that satisfaction of this test, coupled with the large number of constituents in the IBXXIBHY Index and IBXXIBIG Index and the significant aggregate outstanding notional amount of the bonds included in the IBXXIBHY Index and IBXXIBIG Index, contribute to making IBHY options and IBIG options not readily susceptible to manipulation.

(2) CB Options are subject to position limits and position aggregation under Rule 412 and Rule 2402(f). As further described below, the current position limits for each CB Index Futures product will collectively apply to positions in that CB Index Futures product and the related CB Options product. Specifically, a person may not own or control more than the equivalent of 10,000 contracts, net long or net short, in a CB Index Futures product, without obtaining a permissible exemption. In addition to taking into account the number of contracts owned or controlled in a CB Index Futures product, this limit applies to the delta-adjusted (i.e., futures equivalent) number of contracts owned or controlled by a person in the related CB Options product.

(3) CFE believes that the liquidation of CB Index Futures contracts acquired through the exercise of CB Options will not adversely affect the orderly liquidation of CB Index Futures positions and will not increase the susceptibility of CB Index Futures to manipulation. Among other things, CFE notes in this regard that:

- A robust and liquid market exists in CB Index Futures with a demonstrated ability to handle higher trading volumes during periods of high demand for trading in CB Index Futures.
- Hedging and arbitrage opportunities exist in trading between IBHY futures and the HYG ETF and in trading between IBIG futures and the LQD ETF. IBHY futures are highly correlated with the HYG ETF as illustrated by an average of daily return correlations between the near term IBHY future and the HYG ETF of 0.973 during the time period from January 2022 through December 2022 and an average of daily return correlations between the near



term IBIG future and the LQD ETF of 0.987 during that same time period. Because of the similar economic exposures of IBHY futures and the HYG ETF and of IBIG futures and the LQD ETF, liquidity providers may hedge positions they assume in IBHY futures with HYG ETF positions and hedge positions they assume in IBIG futures with LQD ETF positions. Additionally, arbitrage opportunities exist between IBHY futures and the HYG ETF and between IBIG futures and the LQD ETF that contribute to keeping prices consistent across these related markets.

- CB Index Futures are cash-settled. CB Options held to expiration that are exercised are settled into the underlying CB Index Futures contract and the underlying CB Index Futures contract is then settled into cash without the opportunity to transact in the resulting CB Index Futures contract positions prior to cash settlement of those positions.
- CFE maintains an LMM program in each CB Index Futures product, and plans to put an LMM program in place in each CB Options product, with appointed liquidity providers that have market performance benchmarks in these products and which are designed to promote liquidity in these products.
- The indexes that underlie CB Index Futures and CB Options are broad-based in nature as reflected by, among other things, their satisfaction of the test for exclusion from the definition of a narrow-based security index for debt security indexes under CFTC Regulation 41.15, by the number of constituent bonds included in the IBXXIBHY Index (which had 1,180 constituent bonds as of February 28, 2023) and the IBXXIBIG Index (which had 2,566 constituent bonds as of February 28, 2023), and by the significant aggregate outstanding notional amount of the bonds included in the IBXXIBHY Index (which was in excess of \$1.039 trillion as of February 28, 2023) and the IBXXIBIG Index (which was in excess of \$3.644 trillion as of February 28, 2023).

(4) CFE has rules that prohibit fraudulent, manipulative, and disruptive trading practices that will apply to trading in CB Options, including among others, CFE Rule 601 (Fraudulent Acts), CFE Rule 603 (Market Manipulation), CFE Rule 604 (Adherence to Law), CFE Rule 620 (Disruptive Practices), and Policy and Procedure XVIII (Disruptive Trading Practices) of the Policies and Procedures Section of the CFE Rulebook. Activity encompassed by these rules includes prohibited activity that occurs directly through any trading, practice, or conduct in a CFE product or indirectly through any trading, practice, or conduct in the market of any commodity, security, index, or benchmark underlying a CFE product, regardless of the exchange on or market in which the underlying is transacted. Accordingly, these rules will apply to any prohibited activity under those rules that could occur directly through activity in CB Options and to any prohibited activity under those rules that could occur indirectly in transactions utilized in the calculation of the IBXXIBHY Index and IBXXIBIG Index.

(5) CFE Regulation will surveil for potential manipulation of CB Options.

(6) CFE also represents that, to ensure the usefulness of IBHY options and IBIG options, CFE, among other things: (i) conducted market research so that the design of IBHY options and IBIG options meets the risk management needs of prospective users

and promotes price discovery and (ii) consulted with market users and obtained their views and opinions during the contract design process to ensure that:

- the terms and conditions of IBHY options reflect the underlying U.S. dollar denominated, high yield corporate bond market,
- the terms and conditions of IBIG options reflect the underlying U.S. dollar denominated, investment grade corporate bond market, and
- IBHY options and IBIG options will perform the intended risk management and/or price discovery functions;

(iii) DCM Core Principle 4 (Prevention of Market Disruption) in that the trading halt provisions applicable to CB Options, which will halt trading in a CB Options product during a market-wide circuit breaker trading halt and during any trading halt in the CB Index Futures product which underlies that CB Options product, will contribute toward reducing the potential risk of price distortions and market disruptions in the CB Options;

(iv) DCM Core Principle 5 (Position Limitations or Accountability) because, among other things:

CB Options are subject to position limits and position aggregation under CFE Rule 412 (Position Limits) and new CFE Rule 2402(f) (Position Limits). The current position limit for each CB Index Futures product will collectively apply to positions in that CB Index Futures product and the related CB Options product. Positions in both a CB Index Futures product and the related CB Options product will be aggregated when calculating the size of a person's position for purposes of applying those position limits as further described below. Because those position limit provisions will apply to both CB Index Futures and CB Options, CFE is also amending Rule 1502(d) (Position Limits) regarding the position limits for CB Index Futures to incorporate the revisions necessary to collectively apply those position limits to both CB Index Futures and CB Options.

Specifically, a person may not own or control, in the aggregate, more than the equivalent of 10,000 contracts, net long or net short, in any CB Index Futures product, calculated by combining the total of (i) the number of contracts, net long or net short, owned or controlled by the person, in all contract expirations for that CB Index Futures product and (ii) the number of contracts, net long or net short, owned or controlled by the person, in all CB Options contracts in any CB Options product which overlies that CB Index Futures product, calculated on a delta-adjusted (i.e., futures equivalent) basis.

CFE will disseminate a delta value for each CB Options contract for each CFE business day. A delta value is a calculation of the expected change in the price of a CB Options contract given a \$1.00 change in the price of the CB Index Futures contract which underlies that CB Options contract. For purposes of applying the aggregate position limit for CB Index Futures and CB Options, the size of a CB Options contract shall be deemed to be equivalent to the percentage of one CB Index Futures contract which underlies that CB Options contract represented by the delta value of the CB Options contract. A long call/short put CB Options position is treated as equivalent to a long CB Index Futures position for this purpose and a long put/short call CB Options position is treated as equivalent to a short CB Index Futures position for this purpose.

For example, if a person owns a net long position of 5,000 CB Index Futures, a long call position of 1,000 contracts in a CB Options contract with a delta value of 0.5, and a short call position of 8,000 contracts in another CB Options contract with a delta value of -0.25, the person would be deemed to own a net long position of 3,500 CB Index Futures  $(5,000 + (1,000 \times 0.5) + (8,000 \times (-0.25)))$  for purposes of applying the aggregate position limit for CB Index Futures and CB Options.

If a position exceeds the position limit as a result of a CB Option assignment, the person who owns or controls that position shall be allowed one CFE business day to liquidate the excess position without being considered in violation of the position limit. Additionally, if, at the close of trading on a CFE business day, a position that includes CB Options exceeds the position limit when evaluated using the CB Options delta values disseminated by CFE for that CFE business day, but does not exceed the position limit when evaluated using the CB Options delta values disseminated by CFE for the previous CFE business day, then the position shall not constitute a position limit violation.

Accordingly, the Amendment establishes an appropriate initial position limit for the CB Options that will serve to reduce the potential for market manipulation in the CB Options in light of, among other things, that the current position limit for each CB Index Futures product will collectively apply to positions in that CB Index Futures product and the related CB Options product, the broad-based nature of the IBXXIBHY Index and IBXXIBIG Index, the significant aggregate outstanding notional amount of the bonds included in the IBXXIBHY Index (which was in excess of \$1.039 trillion as of February 28, 2023) and the IBXXIBIG Index (which was in excess of \$3.644 trillion as of February 28, 2023), that a position equivalent to 10,000 IBHY futures contracts would equate to approximately \$1.382 billion in notional at current value as of February 28, 2023 (which is a small percentage of the aggregate notional amount of the IBXXIBHY Index), and that a position equivalent to 10,000 IBIG futures contracts would equate to approximately \$1.232 billion in notional at current value as of February 28, 2023 (which is a small percentage of the aggregate notional amount of the IBXXIBIG Index);

(v) DCM Core Principle 6 (Emergency Authority) in that CFE has rule provisions, including CFE Rule 418 (Emergencies), that provide CFE with the ability to exercise emergency authority as necessary and appropriate which will apply to trading in CB Options;

(vi) DCM Core Principle 7 (Availability of General Information) because the chart that summarizes the product specifications for CB Options will be posted and maintained on CFE's website;

(vii) DCM Core Principle 8 (Daily Publication of Trading Information) in that volume, open interest, delta values, daily settlement prices, exercise settlement prices, and other price information for the Product will be made available publicly on a daily basis on CFE's website consistent with Commission Regulation 16.01;

(viii) DCM Core Principle 9 (Execution of Transactions) because CFE will make CB Options available for trading on CFE's trading system which provides for a competitive, open, and efficient market and mechanism for executing transactions that protects the price discovery process of trading on CFE's centralized market;

(ix) DCM Core Principle 10 (Trade Information) in that CFE will maintain trade information for CB Options as part of its audit trail and this information will be accessible to CFE

Regulation for regulatory surveillance and enforcement purposes;

(x) DCM Core Principle 11 (Financial Integrity of Transactions) because CB Options will be cleared by OCC, which is registered with the Commission as a Derivatives Clearing Organization (“DCO”) and is subject to the provisions of the Act and CFTC regulations relating to DCOs;

(xi) DCM Core Principle 12 (Protection of Markets and Market Participants) in that CFE rules include prohibitions against abusive practices, including abusive practices committed by a party acting as an agent for a participant, that will apply in relation to CB Options;

(xii) DCM Core Principle 13 (Disciplinary Procedures) because CFE maintains disciplinary procedures and rules that authorize the Exchange to discipline market participants that commit CFE rule violations, including any rule violations relating to CB Options;

(xiii) DCM Core Principle 14 (Dispute Resolution) in that Chapter 8 (Arbitration) of the CFE Rulebook provides a mechanism for market participants to arbitrate disputes that arise out of transactions executed on or subject to the rules of the Exchange, including transactions in CB Options;

(xiv) DCM Core Principle 18 (Recordkeeping) because CFE’s recordkeeping procedures, established pursuant to Commission Regulation 1.31, will apply with respect to Exchange records relating to CB Options, including trade records and investigatory and disciplinary files;

(xv) DCM Core Principle 19 (Antitrust Considerations) in that the listing of CB Options will promote competition with other futures and options on futures products relating to credit markets that are offered for trading on other DCMs; and

(xvi) DCM Core Principle 20 (System Safeguards) in that CFE maintains system safeguards controls and procedures for its operations and automated systems that will be utilized to facilitate trading in CB Options.

CFE believes that the impact of the Product and Amendment will be beneficial to the public and market participants. CFE is not aware of any substantive opposing views to the Product and Amendment. CFE hereby certifies that the Product and Amendment comply with the Act and the regulations thereunder. CFE further certifies that CFE has posted a notice of pending certification with the Commission and a copy of this submission on CFE’s website ([http://www.cboe.com/us/futures/regulation/rule\\_filings/cfe/](http://www.cboe.com/us/futures/regulation/rule_filings/cfe/)) concurrent with the filing of this submission with the Commission.

#### Contact Information

Questions regarding this submission may be directed to Arthur Reinstein at (312) 786-7570 and Shane Wilkerson at (484) 798-9350. Please reference our submission number CFE-

2023-006 in any related correspondence.

Cboe Futures Exchange, LLC

/s/ Laura Fuson

By: Laura Fuson  
Managing Director

**EXHIBIT 1**

**Summary Product Specifications Chart  
for Options on Cboe® iBoxx® iShares® Bond Index Futures**

|                        |  |
|------------------------|--|
| <b>CONTRACT NAMES:</b> | Options on Cboe® iBoxx® iShares® \$ High Yield Corporate Bond Index Futures (“IBHY options”)<br>Options on Cboe® iBoxx® iShares® \$ Investment Grade Corporate Bond Index Futures (“IBIG options”)   |
| <b>LISTING DATE:</b>   | IBHY options: _____<br>IBIG options: _____   |
| <b>DESCRIPTION:</b>    | <p>The Exchange may list for trading options on the following Cboe® iBoxx® iShares® Bond Index futures (“Corporate Bond Index Futures” or “CB Index Futures”):</p> <ul style="list-style-type: none"> <li>• Cboe® iBoxx® iShares® \$ High Yield Corporate Bond Index Futures (“IBHY futures”)</li> <li>• Cboe® iBoxx® iShares® \$ Investment Grade Corporate Bond Index Futures (“IBIG futures”)</li> </ul> <p>The bond indexes that underlie CB Index Futures are referred to “Corporate Bond Indexes” or “CB Indexes”. IBHY options and IBIG options are referred to as “Corporate Bond Index Options” or “CB Options”.</p> <p>IBHY options are options on IBHY futures. IBHY futures are cash-settled futures on the iBoxx® iShares® \$ High Yield Corporate Bond Index (“IBXXIBHY Index”). The IBXXIBHY Index provides a measure of the U.S. dollar denominated, sub-investment grade corporate bond market.</p> <p>IBIG options are options on IBIG futures. IBIG futures are cash-settled futures on the iBoxx® iShares® \$ Investment Grade Corporate Bond Index (“IBXXIBIG Index”). The IBXXIBIG Index provides a measure of the U.S. dollar denominated, investment grade corporate bond market.</p> <p>CB Options have American-style exercise, are physically settled, and have P.M. settlement. All of the CB Options on contract expirations of a particular CB Index Future are treated as a separate product. A specific CB Index Futures contract underlies each CB Options contract. The exercise of a CB Options contract results in the delivery of one underlying CB Index Futures contract. The CB Index Futures contract that underlies a CB Options contract is the CB Index Futures contract that has the same expiration date as the CB Options contract. As a result, on the expiration date of a CB Options contract, the CB Options contract is settled into the underlying CB Index Futures contract and the underlying CB Index Futures contract is then settled into cash in accordance with the Rules and By-Laws of The Options Clearing Corporation (“OCC”).</p> |

|  |   |                       |                 |         |                        |   |
|--|---|-----------------------|-----------------|---------|------------------------|---|
| <b>TICKER SYMBOLS:</b>                   | IBHY options: IBYO<br>IBIG options: IBGO  |                       |                 |         |                        |   |
| <b>CONTRACT SIZE:</b>                    | One underlying CB Index Futures contract  |                       |                 |         |                        |   |
| <b>CONTRACT EXPIRATIONS:</b>             | The Exchange may list for trading CB Option calls and puts on up to four near-term serial months (“serial” contracts) and four months on the March quarterly cycle (“quarterly” contracts) of each CB Index Futures product.  |                       |                 |         |                        |   |
| <b>EXERCISE (STRIKE) PRICE INTERVAL:</b> | The Exchange may initially list in, at, and/or out-of-the money exercise (strike) prices and may add new exercise (strike) prices as it deems appropriate, including in response to market conditions.<br><br>The minimum exercise (strike) price interval is 0.25 index points.  |                       |                 |         |                        |   |
| <b>TRADING HOURS:</b>                    | <table border="1"> <tr> <td>Type of Trading Hours</td> <td>Monday - Friday</td> </tr> <tr> <td>Regular</td> <td>8:30 a.m. to 3:00 p.m.</td> </tr> </table>  | Type of Trading Hours | Monday - Friday | Regular | 8:30 a.m. to 3:00 p.m. | <p>Market Orders for CB Options will not be accepted by the Exchange for CB Options. Any Market Orders for CB Options received by the Exchange will be automatically rejected or canceled back to the sender.</p> <p>All times referenced are Chicago time.</p> |
| Type of Trading Hours                    | Monday - Friday   |                       |                 |         |                        |   |
| Regular                                  | 8:30 a.m. to 3:00 p.m.  |                       |                 |         |                        |   |
| <b>TRADING PLATFORM:</b>                 | CFE System  |                       |                 |         |                        |   |
| <b>PRICING CONVENTIONS:</b>              | CB Options prices are stated in index points and decimal format.  |                       |                 |         |                        |   |
| <b>MINIMUM PRICE INTERVALS:</b>          | The minimum increment for single leg prices, the individual legs of spreads, and the net prices of spreads in CB Options is 0.01 index points (equal to \$10.00 per contract).  |                       |                 |         |                        |   |
| <b>DOLLAR VALUE PER TICK</b>             | \$10.00 per contract (based on the contract multiplier for CB Index Futures of \$1,000).  |                       |                 |         |                        |   |
| <b>EXERCISE STYLE:</b>                   | American. A CB Option may be exercised on any OCC Business Day up to and including the OCC Business Day prior to its expiration date in accordance with the Rules and By-Laws of OCC. Subject to the Rules and By-Laws of OCC, a CB Option that is in-the-money by \$0.01 or more upon its expiration is automatically exercised on its expiration date and contrary exercise instructions are not permitted. |                       |                 |         |                        |   |
| <b>TRADE AT SETTLEMENT TRANSACTIONS:</b> | Trade at Settlement (“TAS”) transactions are not permitted in CB Options. CB Options will also not be listed on TAS contracts in CB Index Futures.  |                       |                 |         |                        |   |
| <b>CROSSING:</b>                         | The eligible size for an original Order that may be entered for a cross trade with one or more other original Orders pursuant to Rule 407 is ten contracts. The Trading Privilege Holder or Authorized Trader, as applicable, must expose to the market for at least five seconds under Rule 407(a) at least one of the original Orders that it intends to cross.   |                       |                 |         |                        |   |
| <b>PRE-EXECUTION DISCUSSIONS</b>         | The Order Exposure Period under Policy and Procedure IV before an Order may be entered to take the other side of another Order with respect to which there has been pre-execution discussions is five seconds after the first Order was entered into the CFE System.  |                       |                 |         |                        |   |
| <b>EXCHANGE OF CONTRACT FOR</b>          | Exchange of Contract for Related Position (“ECRP”) transactions may not be entered into with respect to CB Options.   |                       |                 |         |                        |   |

|                                       |   |
|---------------------------------------|---|
| <b>RELATED POSITION TRANSACTIONS:</b> |   |
| <b>BLOCK TRADES:</b>                  | <p>The minimum Block Trade quantity for CB Options is 50 contracts if there is only one leg involved in the trade. If the Block Trade is executed as a spread transaction with multiple legs, each leg must meet the minimum Block Trade quantity for CB Options.</p> <p>The minimum price increment for Block Trades in CB Options is 0.005 index points.</p>  |
| <b>NO-BUST RANGE:</b>                 | <p>The CFE error trade policy may only be invoked for a trade price that is higher or lower than the true market price of the applicable CB Options contract by an amount that is larger than the greater of the following three amounts:</p> <ul style="list-style-type: none"> <li>(i) the delta value of the CB Options contract at the relevant time as determined by the Exchange multiplied by the no-bust range for the CB Index Futures contract which underlies the CB Options contract;</li> <li>(ii) 20% of the true market price of the CB Options contract up to 50% of the no-bust range for the CB Index Futures contract which underlies the CB Options contract; and</li> <li>(iii) 15 minimum price increments for the CB Options contract.</li> </ul> <p>In accordance with Policy and Procedure III, the Trade Desk will determine what the true market price for the CB Options contract was immediately before the potential error trade occurred. In making that determination, the Trade Desk may consider all relevant factors, including the last trade price for such Contract, a better bid or offer price, a more recent price in a different series, the prices of related contracts trading in other markets and the theoretical value of the CB Options contract as determined by the Exchange.</p> |
| <b>TERMINATION OF TRADING:</b>        | Trading hours in an expiring CB Options contract end at 3:00 p.m. Chicago time on its expiration date.  |
| <b>POSITION LIMITS:</b>               | <p>CB Options are subject to position limits under Rule 412.</p> <p>A Person may not own or control, in the aggregate, more than the equivalent of 10,000 contracts, net long or net short, in any CB Index Futures product, calculated by combining the total of:</p> <ul style="list-style-type: none"> <li>(i) the number of contracts, net long or net short, owned or controlled by the Person, in all contract expirations for that CB Index Futures product; and</li> <li>(ii) the number of contracts, net long or net short, owned or controlled by the Person, in all CB Options contracts in any CB Options product which overlies that CB Index Futures product, calculated on a delta-adjusted (i.e., futures equivalent) basis.</li> </ul>  |



|                                  |   |
|----------------------------------|---|
|                                  | <p>The Exchange will disseminate a delta value for each CB Options contract for each CFE Business Day. A delta value is a calculation of the expected change in the price of a CB Options contract given a \$1.00 change in the price of the CB Index Futures contract which underlies that CB Options contract. For purposes of applying the aggregate position limit for CB Index Futures and CB Options, the size of a CB Options contract shall be deemed to be equivalent to the percentage of one CB Index Futures contract which underlies that CB Options contract represented by the delta value of the CB Options contract. A long call/short put CB Options position is treated as equivalent to a long CB Index Futures position for this purpose and a long put/short call CB Options position is treated as equivalent to a short CB Index Futures position for this purpose.</p> <p>For example, if a Person owns a net long position of 5,000 CB Index Futures, a long call position of 1,000 contracts in a CB Options contract with a delta value of 0.5, and a short call position of 8,000 contracts in another CB Options contract with a delta value of -0.25, the Person would be deemed to own a net long position of 3,500 CB Index Futures (5,000 + (1,000 x 0.5) + (8,000 x (-0.25))) for purposes of applying the aggregate position limit for CB Index Futures and CB Options.</p> <p>If a position exceeds the position limit as a result of a CB Option assignment, the Person who owns or controls that position shall be allowed one CFE Business Day to liquidate the excess position without being considered in violation of the position limit. Additionally, if, at the close of trading on a CFE Business Day, a position that includes CB Options exceeds the position limit when evaluated using the CB Options delta values disseminated by the Exchange for that CFE Business Day, but does not exceed the position limit when evaluated using the CB Options delta values disseminated by the Exchange for the previous CFE Business Day, then the position shall not constitute a position limit violation.</p> <p>For the purposes of Rule 412, positions shall be aggregated in accordance with Rule 412(e).</p> <p>The foregoing position limit shall not apply to positions that are subject to a position limit exemption meeting the requirements of Commission Regulations and CFE Rules.</p> |
| <b>MINIMUM REPORTABLE LEVEL:</b> | 200 for each CB Options product.  |
| <b>EXPIRATION DATE:</b>          | <p>The expiration date of a CB Options contract is the final settlement date of the CB Index Futures contract that underlies the CB Options contract.</p> <p>The final settlement date for a CB Index Futures contract is the first business day of the calendar month denoted by the ticker symbol for the CB Index Futures contract. If the final settlement date for a CB</p>  |

|   |   |
|---|---|
|   | <p>Index Futures contract is a CFE holiday, the final settlement date for the CB Index Futures contract is the CFE Business Day immediately following the holiday.</p>  |
| <b>EXERCISE AND DELIVERY:</b>                           | <p>The exercise of CB Options and the delivery following exercise of underlying CB Index Futures is governed by the Rules and By-Laws of OCC.</p> <p>Exercise of a CB Options contract results in the delivery on the following OCC business day of one underlying CB Index Futures contract that has the same expiration date as the CB Options contract.</p>  |
| <b>EXERCISE SETTLEMENT VALUE:</b>                       | <p>The exercise settlement value of an expiring CB Options contract shall be the closing index value of the applicable CB Index on the expiration date of the CB Options contract as determined by Markit Indices Limited.</p> <p>The exercise settlement value will be rounded to the nearest \$0.01.</p> <p>If the exercise settlement value is not available or the normal settlement procedure cannot be utilized due to a trading disruption or other unusual circumstance, the exercise settlement value will be determined in accordance with the Rules and Bylaws of The Options Clearing Corporation.</p>  |
| <b>SETTLEMENT AT EXPIRATION:</b>                        | <p>Subject to the Rules and By-Laws of OCC, CB Options that are in-the-money by \$0.01 or more upon their expiration are automatically exercised and contrary exercise instructions are not permitted.</p>  |
| <b>MARKIT AND BLACKROCK DISCLAIMERS AND TRADEMARKS:</b> | <p>The iBoxx<sup>®</sup> iShares<sup>®</sup> \$ High Yield Corporate Bond Index and the iBoxx<sup>®</sup> iShares<sup>®</sup> \$ Investment Grade Corporate Bond Index (the “Indexes”) referenced herein are the property of Markit Indices Limited (“Index Sponsor”) and have been licensed for use in connection with Cboe<sup>®</sup> iBoxx<sup>®</sup> iShares<sup>®</sup> \$ High Yield Corporate Bond Index Futures, Options on Cboe<sup>®</sup> iBoxx<sup>®</sup> iShares<sup>®</sup> \$ High Yield Corporate Bond Index Futures, Cboe<sup>®</sup> iBoxx<sup>®</sup> iShares<sup>®</sup> \$ Investment Grade Corporate Bond Index Futures and Options on Cboe<sup>®</sup> iBoxx<sup>®</sup> iShares<sup>®</sup> \$ Investment Grade Corporate Bond Index Futures. Each party to a transaction in Cboe<sup>®</sup> iBoxx<sup>®</sup> iShares<sup>®</sup> \$ High Yield Corporate Bond Index Futures, Options on Cboe<sup>®</sup> iBoxx<sup>®</sup> iShares<sup>®</sup> \$ High Yield Corporate Bond Index Futures, Cboe<sup>®</sup> iBoxx<sup>®</sup> iShares<sup>®</sup> \$ Investment Grade Corporate Bond Index Futures or Options on Cboe<sup>®</sup> iBoxx<sup>®</sup> iShares<sup>®</sup> \$ Investment Grade Corporate Bond Index Futures acknowledges and agrees that the transaction is not sponsored, endorsed or promoted by the Index Sponsor. The Index Sponsor makes no representation whatsoever, whether express or implied, and hereby expressly disclaims all warranties (including, without limitation, those of merchantability or fitness for a particular purpose or use), with respect to the Indexes or any data included therein or relating thereto, and in particular disclaims any warranty either as to the quality, accuracy and/or completeness of the Indexes or any data included therein, the results obtained from the use of the Indexes and/or the composition of the Indexes at any particular time</p> |

on any particular date or otherwise and/or the creditworthiness of any entity, or the likelihood of the occurrence of a credit event or similar event (however defined) with respect to an obligation, in the Indexes at any particular time on any particular date or otherwise. The Index Sponsor shall not be liable (whether in negligence or otherwise) to the parties or any other person for any error in the Indexes, and the Index Sponsor is under no obligation to advise the parties or any person of any error therein.

The Index Sponsor makes no representation whatsoever, whether express or implied, as to the advisability of purchasing or selling Cboe® iBoxx® iShares® \$ High Yield Corporate Bond Index Futures, Options on Cboe® iBoxx® iShares® \$ High Yield Corporate Bond Index Futures, Cboe® iBoxx® iShares® \$ Investment Grade Corporate Bond Index Futures and Options on Cboe® iBoxx® iShares® \$ Investment Grade Corporate Bond Index Futures; the ability of the Indexes to track relevant markets' performances; or otherwise relating to the Indexes or any transaction or product with respect thereto, or of assuming any risks in connection therewith. The Index Sponsor has no obligation to take the needs of any party into consideration in determining, composing or calculating the Indexes. No party purchasing or selling Cboe® iBoxx® iShares® \$ High Yield Corporate Bond Index Futures, Options on Cboe® iBoxx® iShares® \$ High Yield Corporate Bond Index Futures, Cboe® iBoxx® iShares® \$ Investment Grade Corporate Bond Index Futures or Options on Cboe® iBoxx® iShares® \$ Investment Grade Corporate Bond Index Futures, nor the Index Sponsor, shall have any liability to any party for any act or failure to act by the Index Sponsor in connection with the determination, adjustment, calculation or maintenance of the Indexes. iBoxx® is a service mark of IHS Markit Limited.

The iBoxx® iShares® \$ High Yield Corporate Bond Index and the iBoxx® iShares® \$ Investment Grade Corporate Bond Index (the "Indexes"), futures contracts on the Indexes and options on futures contracts on the Indexes ("Contracts") are not sponsored by, or sold by BlackRock, Inc. or any of its affiliates (collectively, "BlackRock"). BlackRock makes no representation or warranty, express or implied to any person regarding the advisability of investing in securities, generally, or in the Contracts in particular. Nor does BlackRock make any representation or warranty as to the ability of the Index to track the performance of the fixed income securities market, generally, or the performance of HYG, LQD or any subset of fixed income securities.

BlackRock has not calculated, composed or determined the constituents or weightings of the fixed income securities that comprise the Indexes ("Underlying Data"). BlackRock is not responsible for and has not participated in the determination of the prices and amounts of the Contracts, or the timing of the issuance or sale of such Contracts or in the determination or calculation of the

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|  | <p>equation by which the Contracts are to be converted into cash (if applicable). BlackRock has no obligation or liability in connection with the administration or trading of the Contracts. BlackRock does not guarantee the accuracy or the completeness of the Underlying Data and any data included therein and BlackRock shall have no liability for any errors, omissions or interruptions related thereto.</p> <p>BlackRock makes no warranty, express or implied, as to results to be obtained by Markit or its affiliates, the parties to the Contracts or any other person with respect to the use of the Underlying Data or any data included therein. BlackRock makes no express or implied warranties and expressly disclaims all warranties of merchantability or fitness for a particular purpose or use with respect to the Underlying Data or any data included therein. Without limiting any of the foregoing, in no event shall BlackRock have any liability for any special, punitive, direct, indirect or consequential damages (including lost profits) resulting from the use of the Underlying Data or any data included therein, even if notified of the possibility of such damages.</p> <p>iShares<sup>®</sup> is a registered trade mark of BlackRock Fund Advisors and its affiliates.</p> |
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## EXHIBIT 2

The Amendment, marked to show additions in underlined text and deletions in ~~stricken~~ text, consists of the following:

\* \* \* \* \*

### Cboe Futures Exchange, LLC Rulebook

\* \* \* \* \*

#### 1502. Contract Specifications

(a) - (c) No changes.

(d) *Position Limits.* CB Index futures are subject to position limits under Rule 412.

~~A person may not own or control more than 10,000 contracts net long or net short in all expirations combined for each CB Index futures product.~~

A Person may not own or control, in the aggregate, more than the equivalent of 10,000 contracts, net long or net short, in any CB Index Futures product, calculated by combining the total of:

(i) the number of contracts, net long or net short, owned or controlled by the Person, in all contract expirations for that CB Index Futures product; and

(ii) the number of contracts, net long or net short, owned or controlled by the Person, in all CB Options Contracts in any CB Options product which overlies that CB Index Futures product, calculated on a delta-adjusted (i.e., futures equivalent) basis.

The Exchange will disseminate a delta value for each CB Options Contract for each Business Day. A delta value is a calculation of the expected change in the price of a CB Options Contract given a \$1.00 change in the price of the CB Index Futures Contract which underlies that CB Options Contract. For purposes of applying the aggregate position limit for CB Index Futures and CB Options, the size of a CB Options Contract shall be deemed to be equivalent to the percentage of one CB Index Futures Contract which underlies that CB Options Contract represented by the delta value of the CB Options Contract. A long call/short put CB Options position is treated as equivalent to a long CB Index Futures position for this purpose and a long put/short call CB Options position is treated as equivalent to a short CB Index Futures position for this purpose.

If a position exceeds the position limit as a result of a CB Option assignment, the Person who owns or controls that position shall be allowed one Business Day to liquidate the excess position without being considered in violation of the position limit. Additionally, if, at the close of trading on a Business Day, a position that includes CB Options exceeds the position limit when evaluated using the CB Options delta values disseminated by the Exchange for that Business Day, but does not exceed the position limit when evaluated

using the CB Options delta values disseminated by the Exchange for the previous Business Day, then the position shall not constitute a position limit violation.

For the purposes of this Rule, positions shall be aggregated in accordance with Rule 412(e).

The foregoing position limit shall not apply to positions that are subject to a position limit exemption meeting the requirements of Commission Regulations and CFE Rules.

(e) - (r) No changes.

\* \* \* \* \*

**CHAPTER 24**  
**RESERVED**  
**OPTIONS ON CBOE® iBOXX® iSHARES® BOND INDEX FUTURES**  
**CONTRACT SPECIFICATIONS**

**2401. Scope of Chapter**

This chapter applies to trading in Options on Cboe® iBoxx® iShares® Bond Index futures.\* The procedures for trading, clearing, settlement, and any other matters not specifically covered herein shall be governed by the generally applicable rules of the Exchange. The Exchange may list for trading on the Exchange options on the following Cboe® iBoxx® iShares® Bond Index futures (“Corporate Bond Index Futures” or “CB Index Futures”):

Cboe® iBoxx® iShares® \$ High Yield Corporate Bond Index Futures (“IBHY futures”)

Cboe® iBoxx® iShares® \$ Investment Grade Corporate Bond Index Futures (“IBIG futures”)

The bond indexes that underlie CB Index Futures are referred to “Corporate Bond Indexes” or “CB Indexes”.

Options on Cboe® iBoxx® iShares® \$ High Yield Corporate Bond Index Futures (“IBHY options”) and Options on Cboe® iBoxx® iShares® \$ Investment Grade Corporate Bond Index Futures (“IBIG options”) are referred to as “Corporate Bond Index Options” or “CB Options”.

All of the CB Options on contract expirations of a particular CB Index Future are treated as a separate product. A specific CB Index Futures Contract underlies each CB Options Contract.

The Exchange first listed CB Options for trading on the Exchange on \_\_\_\_\_.

\*iBoxx® is a service mark IHS Markit Limited. iShares® is a registered trademark of BlackRock Fund Advisors and its affiliates.

## 2402. Contract Specifications

(a) Contract Size. The exercise of a CB Options Contract results in the delivery of one underlying CB Index Futures Contract. The CB Index Futures Contract that underlies a CB Options Contract is the CB Index Futures Contract that has the same expiration date as the CB Options Contract.

(b) Contract Expirations. The Exchange may list for trading CB Option calls and puts on up to four near-term serial months (“serial” contracts) and four months on the March quarterly cycle (“quarterly” contracts) of each CB Index Futures product.

(c) Exercise (Strike) Prices. The Exchange may initially list in, at, and/or out-of-the-money exercise (strike) prices and may add new exercise (strike) prices for CB Options as it deems appropriate, including in response to market conditions.

The minimum exercise (strike) price interval for CB Options is 0.25 index points.

(d) Schedule and Prohibited Order Types. The expiration date of a CB Options Contract is the final settlement date of the CB Index Futures contract that underlies the CB Options Contract.

The final settlement date for a CB Index Futures Contract is the first business day of the calendar month denoted by the ticker symbol for the CB Index Futures Contract. If the final settlement date for a CB Index Futures Contract is a CFE holiday, the final settlement date for the CB Index Futures Contract is the CFE Business Day immediately following the holiday.

The trading days for CB Options are any Business Day the Exchange is open for trading.

The trading hours for CB Options are from 8:30 a.m. to 3:00 p.m. Chicago time.

Market Orders for CB Options will not be accepted by the Exchange for CB Options. Any Market Orders for CB Options received by the Exchange will be automatically rejected or canceled back to the sender.

(e) Minimum Increments. The minimum increment for single leg prices, the individual legs of spreads, and the net prices of spreads in CB Options is 0.01 index points (equal to a dollar value per minimum increment of \$10.00 per contract).

(f) Position Limits. CB Options are subject to position limits under Rule 412.

A Person may not own or control, in the aggregate, more than the equivalent of 10,000 contracts, net long or net short, in any CB Index Futures product, calculated by combining the total of:

(i) the number of contracts, net long or net short, owned or controlled by the Person, in all contract expirations for that CB Index Futures product; and

(ii) the number of contracts, net long or net short, owned or

controlled by the Person, in all CB Options Contracts in any CB Options product which overlies that CB Index Futures product, calculated on a delta-adjusted (i.e., futures equivalent) basis.

The Exchange will disseminate a delta value for each CB Options Contract for each Business Day. A delta value is a calculation of the expected change in the price of a CB Options Contract given a \$1.00 change in the price of the CB Index Futures Contract which underlies that CB Options Contract. For purposes of applying the aggregate position limit for CB Index Futures and CB Options, the size of a CB Options Contract shall be deemed to be equivalent to the percentage of one CB Index Futures Contract which underlies that CB Options Contract represented by the delta value of the CB Options Contract. A long call/short put CB Options position is treated as equivalent to a long CB Index Futures position for this purpose and a long put/short call CB Options position is treated as equivalent to a short CB Index Futures position for this purpose.

If a position exceeds the position limit as a result of a CB Option assignment, the Person who owns or controls that position shall be allowed one Business Day to liquidate the excess position without being considered in violation of the position limit. Additionally, if, at the close of trading on a Business Day, a position that includes CB Options exceeds the position limit when evaluated using the CB Options delta values disseminated by the Exchange for that Business Day, but does not exceed the position limit when evaluated using the CB Options delta values disseminated by the Exchange for the previous Business Day, then the position shall not constitute a position limit violation.

For the purposes of Rule 412, positions shall be aggregated in accordance with Rule 412(e).

The foregoing position limit shall not apply to positions that are subject to a position limit exemption meeting the requirements of Commission Regulations and CFE Rules.

(g) *Termination of Trading.* Trading hours in an expiring CB Options Contract end at 3:00 p.m. Chicago time on its expiration date.

(h) *Contract Modifications.* Specifications are fixed as of the first day of trading of a Contract. If any U.S. government agency or body issues an order, ruling, directive or law that conflicts with the requirements of these rules, such order, ruling, directive or law shall be construed to take precedence and become part of these rules, and all open and new Contracts shall be subject to such government orders.

(i) *Execution Priorities.* Pursuant to Rule 406(a)(i), the base allocation method of price-time priority shall apply to trading in CB Options.

(j) *Crossing Two Original Orders.* The eligible size for an original Order that may be entered for a cross trade with one or more other original Orders pursuant to Rule 407 is ten Contracts. The Trading Privilege Holder or Authorized Trader, as applicable, must expose to the market for at least five seconds under Rule 407(a) at least one of the original Orders that it intends to cross.

(k) *Price Limits and Halts.*

(i) *Price Limits.* Pursuant to Rule 413, CB Options are not subject



to price limits.

(ii) *Circuit Breaker Halts.* Trading in CB Options shall be halted pursuant to Rule 417A if there is a Level 1, 2 or 3 Market Decline.

(iii) *Halts in Underlying Futures Product.* CFE shall halt trading in a CB Options product during any trading halt in the CB Index Futures product which underlies that CB Options product.

(l) *Exchange of Contract for Related Position.* Exchange of Contract for Related Position transactions, as set forth in Rule 414, may be not entered into with respect to CB Index futures.

(m) *Block Trades.* Pursuant to Rule 415(a)(i), the minimum Block Trade quantity for CB Options is 50 contracts if there is only one leg involved in the trade. If the Block Trade is executed as a spread transaction with multiple legs, each leg must meet the minimum Block Trade quantity for CB Options.

The minimum price increment for a Block Trade in CB Options is 0.005 index points.

(n) *No-Bust Range.* Pursuant to Rule 416, the CFE error trade policy may only be invoked for a trade price that is higher or lower than the true market price of the applicable CB Options Contract by an amount that is larger than the greater of the following three amounts:

(i) the delta value of the CB Options Contract at the relevant time as determined by the Exchange multiplied by the no-bust range for the CB Index Futures Contract which underlies the CB Options Contract;

(ii) 20% of the true market price of the CB Options Contract up to 25% of the no-bust range for the CB Index Futures Contract which underlies the CB Options Contract; and

(iii) 2 minimum price increments for the CB Options Contract.

In accordance with Policy and Procedure III, the Trade Desk will determine what the true market price for the CB Options Contract was immediately before the potential error trade occurred. In making that determination, the Trade Desk may consider all relevant factors, including the last trade price for such Contract, a better bid or offer price, a more recent price in a different series, the prices of related contracts trading in other markets and the theoretical value of the CB Options Contract as determined by the Exchange.

(o) *Pre-execution Discussions.* The Order Exposure Period under Policy and Procedure IV before an Order may be entered to take the other side of another Order with respect to which there has been pre-execution discussions is five seconds after the first Order was entered into the CFE System.

(p) *Reportable Position and Trading Volume.*

(i) *Reportable Position.* Pursuant to Commission Regulation §15.03 and Commission Regulation Part 17, the position level that is required to

be reported to the Commission is any open position in a CB Options product at the close of trading on any trading day equal to or in excess of 200 contracts on either side of the market.

(ii) Reportable Trading Volume. Pursuant to Commission Regulation §15.04 and Commission Regulation Part 17, the reportable trading volume that triggers the requirement to report a volume threshold account to the Commission is 50 or more contracts in a CB Options product during a single trading day or such other reportable trading volume threshold as may be designated by the Commission.

(q) Daily Settlement Price. The daily settlement price for a CB Options Contract will be determined in the following manner for each Business Day other than the expiration date of the CB Options Contract:

(i) The daily settlement price for the CB Options Contract will be determined by the Exchange by utilizing a Cox-Ross-Rubinstein binomial tree model to derive the theoretical option price for that Contract utilizing its theoretical volatility.

(ii) The daily settlement price may go out to four decimal places and may be a price that is not at a minimum increment for the CB Options Contract.

(iii) The Exchange may in its sole discretion establish a daily settlement price for a CB Options Contract that it deems to be a fair and reasonable reflection of the market if:

(A) a calculation of the theoretical option price for the CB Options Contract calculated as described in paragraph (q)(i) above is not available for use in determining the daily settlement price of the CB Options Contract due to a system issue or other reason;

(B) the Exchange determines in its sole discretion that the theoretical option price for the CB Options Contract calculated as described in paragraph (q)(i) above is not a fair and reasonable reflection of the market; or

(C) there is a trading halt in the CB Options Contract or other unusual circumstance at or around the scheduled close of trading hours for the CB Options Contract on the applicable Business Day.

(r) Trade at Settlement Transactions. Trade at Settlement (“TAS”) transactions pursuant to Rule 404A are not permitted in CB Options. CB Options will also not be listed on TAS contracts in CB Index Futures.

(s) Price Reasonability Checks. The Limit Order price reasonability percentage parameters designated by the Exchange for CB Options pursuant to Rule 513A(d) are set forth in the table below.

| <b>Limit Price of Limit Order</b> | <b>Price Reasonability Percentage</b> |
|-----------------------------------|---------------------------------------|
|-----------------------------------|---------------------------------------|

|                           |             |
|---------------------------|-------------|
| <u>≤ \$0.50</u>           | <u>400%</u> |
| <u>\$0.51 - \$1.99</u>    | <u>35%</u>  |
| <u>\$2.00 - \$5.00</u>    | <u>20%</u>  |
| <u>\$5.01 - \$10.00</u>   | <u>15%</u>  |
| <u>\$10.01 - \$20.00</u>  | <u>10%</u>  |
| <u>\$20.01 - \$50.00</u>  | <u>6%</u>   |
| <u>\$50.01 - \$100.00</u> | <u>4%</u>   |
| <u>≥ 100.01</u>           | <u>4%</u>   |

(t) Exercise Style. CB Options have American-style exercise. A CB option may be exercised on any Business Day of The Options Clearing Corporation (“OCC”) up to and including the OCC Business Day prior to its expiration date in accordance with the Rules and By-Laws of OCC. Subject to the Rules and By-Laws of OCC, a CB option that is in-the-money by \$0.01 or more upon its expiration is automatically exercised on its expiration date and contrary exercise instructions are not permitted.

(u) Exercise and Delivery. The exercise of CB Options and the delivery following exercise of underlying CB Index Futures is governed by the Rules and By-Laws of OCC. Exercise of a CB Options contract results in the delivery on the following OCC business day of one underlying CB Index Futures contract that has the same expiration date as the CB Options contract.

### **2403. Settlement**

The exercise settlement value of an expiring CB Options Contract shall be the closing index value of the applicable CB Index on the expiration date of the CB Options Contract as determined by Markit Indices Limited. The exercise settlement value will be rounded to the nearest \$0.01.

Subject to the Rules and By-Laws of OCC, CB Options that are in-the-money by \$0.01 or more upon their expiration are automatically exercised and contrary exercise instructions are not permitted.

Clearing Members holding open positions in a CB Options Contract at the expiration of the CB Options Contract that are in-the-money shall deliver or receive the underlying CB Options Contract in accordance with the Rules and By-Laws of OCC.

The CB Index Futures Contract that underlies a CB Options Contract is the CB Index Futures Contract that has the same expiration date as the CB Options Contract. As a result, on the expiration date of a CB Options Contract, the CB Options contract is settled into the underlying CB Index Futures Contract and the underlying CB Index Futures Contract is then settled into cash in accordance with the Rules and By-Laws of OCC.

If the exercise settlement value is not available or the normal settlement procedure cannot be utilized due to a trading disruption or other unusual circumstance, the exercise settlement value will be determined in accordance with the Rules and Bylaws of OCC.

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