

July 6, 2023

**SUBMITTED VIA CFTC PORTAL**

Secretary of the Commission  
Office of the Secretariat  
U.S. Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, D.C. 20581

Re: KalshiEX LLC – CFTC Regulation 40.6 Notification Regarding the Amendment of the “Will core CPI growth be <above/below/between> <percent> in <month>?” Contract

Dear Sir or Madam,

Pursuant to Section 5c(c) of the Commodity Exchange Act and Section 40.6 of the regulations of the Commodity Futures Trading Commission, KalshiEX LLC (Kalshi) hereby notifies the Commission that it is amending the “Will core CPI growth be <above/below/between> <percent> in <month>?” contract (Contract).

This contract is a straight-forward modification to the previous “Will core CPI growth be <above/below/between> <percent> in <month>?” contract. The changes are as follows:

1. The position limit has been changed from \$25,000 to \$7,000,000.

Along with this letter, Kalshi submitted the following documents:

- A clean copy of the amended Contract; and
- A redline showing the changes to Appendix A, the product rules and terms and conditions of the contract.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Xavier Sottile  
Head of Markets  
KalshiEX LLC  
xsottile@kalshi.com

KalshiEX LLC

Official Product Name: Will core CPI growth be <above/below/between> <percent> in <month>?

Rulebook: CORECPI

Kalshi Contract Category: Economic/Demographic Data – U.S. Government

Core CPI

July 6, 2023

**CONCISE EXPLANATION AND ANALYSIS OF THE PRODUCT AND ITS COMPLIANCE WITH APPLICABLE PROVISIONS OF THE ACT, INCLUDING CORE PRINCIPLES AND THE COMMISSION'S REGULATIONS THEREUNDER**

Pursuant to Commission Rule 40.2(a)(3)(v), the following is a concise explanation and analysis of the product and its compliance with the Act, including the relevant Core Principles, and the Commission's regulations thereunder.

**I. Introduction**

The “Will core CPI growth be <above/below/between> <percent> in <month>?” Contract is a contract relating the inflation rate in the United States. After careful analysis, Kalshi (hereafter referred to as “Exchange”) has determined that the Contract complies with its vetting framework, which has been reviewed by the CFTC and formed part of the Exchange’s application for designation as a Contract Market (“DCM”) that was approved by the Commission.

The consumer price index (CPI) is the most common metric of measuring inflation. Inflation is an economic phenomenon whereby the value of money is reduced. “Core” CPI excludes food and energy from the index, which are considered more volatile than most sectors of the economy. As a result, core CPI could be a better indicator of inflationary pressure and its likely path forward.

Further information about the Contract, including an analysis of its risk mitigation and price basing utility, as well as additional considerations related to the Contract, is included in Confidential Appendices B, C, and D.

Pursuant to Section 5c(c) of the Act and CFTC Regulations 40.2(a), the Exchange hereby certifies that the listing of the Contract complies with the Act and Commission regulations under the Act.

**General Contract Terms and Conditions:** The Contract operates similar to other binary contracts that the Exchange lists for trading. The minimum price fluctuation is \$0.01 (one cent). Price bands will apply so that Contracts may only be listed at values of at least

\$0.01 and at most \$0.99. Further, the Contract is sized with a one-dollar notional value and has a minimum price fluctuation of \$0.01 to enable Members to match the size of the contracts purchased to their economic risks. The Exchange has further imposed position limits (defined as maximum loss exposure) of \$7,000,000 USD on the Contract. As outlined in Rule 5.12 of the Rulebook, trading shall be available at all times outside of any maintenance windows, which will be announced in advance by the Exchange. Members will be charged fees in accordance with Rule 3.6 of the Rulebook. Fees are charged in such amounts as may be revised from time to time to be reflected on the Exchange's Website. Additionally, as outlined in Rule 7.2 of the Rulebook, if any event or any circumstance which may have a material impact on the reliability or transparency of a Contract's Source Agency or the Underlying related to the Contract arises, Kalshi retains the authority to designate a new Source Agency and Underlying for that Contract and to change any associated Contract specifications after the first day of trading. That new Source Agency and Underlying would be objective and verifiable. Kalshi would announce any such decision on its website. All instructions on how to access the Underlying are non-binding and are provided for convenience only and are not part of the binding Terms and Conditions of the Contract. They may be clarified at any time. Furthermore, the Contract's payout structure is characterized by the payment of an absolute amount to the holder of one side of the option and no payment to the counterparty. During the time that trading on the Contract is open, Members are able to adjust their positions and trade freely. After trading on the Contract has closed, the Expiration Value and Market Outcome are determined. The market is then settled by the Exchange, and the long position holders and short position holders are paid according to the Market Outcome. In this case, "long position holders" refers to Members who purchased the "Yes" side of the Contract and "short position holders" refers to Members who purchased the "No" side of the Contract. If the Market Outcome is "Yes," meaning that U.S. core CPI growth in <month> is <above/below/between> <percent>, then the long position holders are paid an absolute amount proportional to the size of their position and the short position holders receive no payment. If the Market Outcome is "No," then the short position holders are paid an absolute amount proportional to the size of their position and the long position holders receive no payment. Specification of the circumstances that would trigger a Market Outcome of "Yes" are included below in the section titled "Payout Criterion" in Appendix A.

**CERTIFICATIONS PURSUANT TO SECTION 5c OF THE COMMODITY EXCHANGE  
ACT, 7 U.S.C. § 7A-2 AND COMMODITY FUTURES TRADING COMMISSION RULE  
40.2, 17 C.F.R. § 40.2**

Based on the above analysis, the Exchange certifies that:

- The Contract complies with the Act and Commission regulations thereunder.
- This submission (other than those appendices for which confidential treatment has been requested) has been concurrently posted on the Exchange's website at <https://kalshi.com/regulatory/filings>.

Should you have any questions concerning the above, please contact the exchange at [ProductFilings@kalshi.com](mailto:ProductFilings@kalshi.com).



---

By: Xavier Sottile  
Title: Head of Markets  
Date: July 6, 2023

**Attachments:**

Appendix A - Contract Terms and Conditions

Appendix B (Confidential) - Further Considerations

Appendix C (Confidential) - Source Agency

Appendix D (Confidential) - Compliance with Core Principles

**APPENDIX A – CONTRACT TERMS AND CONDITIONS**

**TERMS OF CONTRACTS TRADED ON KALSHI**

**Official Product Name: Will core CPI growth be <above/below/between> <percent> in  
<month>?**

**Rulebook: CORECPI**

## CORECPI

**Scope:** These rules shall apply to this contract.

**Underlying:** The Underlying for this Contract is the percent change in the seasonally adjusted Consumer Price Index for All Urban Consumers (CPI-U) for all items less food and energy published by the Bureau of Labor Statistics (“BLS”) in the Consumer Price Index Summary for <month>. Please note that the Underlying is the single decimal point percent change value (e.g. 0.2) reported by the BLS. Revisions to the Underlying made after Expiration will not be accounted for in determining the Expiration Value.

**Instructions:** The Underlying can be accessed [here](#).<sup>1</sup> A schedule of release dates is available on the BLS website ([here](#)), and the data is released at 8:30am ET.<sup>2</sup> Each month’s report is available at [this](#) stable URL, which automatically displays the latest available report. The Underlying for a given month is typically listed in the first sentence of the third paragraph of the first page of the monthly report under the heading “CONSUMER PRICE INDEX-[Month/Year]”. For example, in the CPI report for April 2022, the first sentence of the third paragraph is “The index for all items less food and energy rose 0.6 percent in April...” so 0.6 percent would be the value for the month of April 2022. Historical reports from prior months are available on the Bureau of Labor Statistics website [here](#). If you select the year in question, links to CPI reports from months in that year will be displayed. These instructions on how to access the Underlying are provided for convenience only and are not part of the binding Terms and Conditions of the Contract. They may be clarified at any time.

**Source Agency:** The Source Agency is the Bureau of Labor Statistics.

**Type:** The type of Contract is a Binary Contract.

**Issuance:** The Contract is based on the outcome of a recurrent data release, which is issued on a monthly basis. Thus, Contract iterations will be issued on a recurring basis, and future Contract iterations will generally correspond to a given calendar year. The Exchange may add new strike values of <percent> as market conditions change.

**<percent>:** Kalshi may list iterations of the Contract with <percent> levels that fall within an inclusive range between 0 and 500 at consecutive increments of 0.1. Due to the potential for variability in the Underlying, the Exchange may modify <percent> levels in response to suggestions by Members.

---

<sup>1</sup> <https://www.bls.gov/cpi/>

<sup>2</sup> [https://www.bls.gov/schedule/news\\_release/cpi.htm](https://www.bls.gov/schedule/news_release/cpi.htm)

**<month>**: <month> refers to a calendar month specified by Kalshi. Kalshi may list iterations of the Contract corresponding to variations of <month>.

**Payout Criterion:** The Payout Criterion for the Contract encompasses the Expiration Values that contain a value that is <above/below/between> <percent>. If the value of <above/below/between> is “between”, then <percent> shall be a pair of percents and the Payout Criterion encompasses the Expiration Values that are greater than or equal to the lesser of the pair, and less than or equal to the greater of the pair.

**Minimum Tick:** The Minimum Tick size for the referred Contract shall be \$0.01.

**Position Limit:** The Position Limit for the \$1 referred Contract shall be \$7,000,000 per Member.

**Last Trading Date:** The Last Trading Date of the Contract will be the date of the scheduled data release for <month>. The Last Trading Time will be 8:25 AM ET.

**Settlement Date:** The Settlement Date of the Contract shall be no later than the day after the Expiration Date, unless the Market Outcome is under review pursuant to Rule 7.1.

**Expiration Date:** The Expiration Date of the Contract shall be the sooner of the date of the first 10:00 AM ET following the release of data for <month>, or one week after the data release was scheduled to occur.

**Expiration time:** The Expiration time of the Contract shall be 10:00 AM ET.

**Settlement Value:** The Settlement Value for this Contract is \$1.00.

**Expiration Value:** The Expiration Value is the value of the Underlying as documented by the Source Agency on the Expiration Date at the Expiration time.

**Contingencies:** Before Settlement, Kalshi may, at its sole discretion, initiate the Market Outcome Review Process pursuant to Rule 6.3(c) of the Rulebook. Additionally, as outlined in Rule 7.2 of the Rulebook, if any event or any circumstance which may have a material impact on the reliability or transparency of a Contract’s Source Agency or the Underlying related to the Contract arises, Kalshi retains the authority to designate a new Source Agency and Underlying for that Contract and to change any associated Contract specifications after the first day of trading.



## CORECPI REDLINE

**Scope:** These rules shall apply to this contract.

**Underlying:** The Underlying for this Contract is the percent change in the seasonally adjusted Consumer Price Index for All Urban Consumers (CPI-U) for all items less food and energy published by the Bureau of Labor Statistics (“BLS”) in the Consumer Price Index Summary for <month>. Please note that the Underlying is the single decimal point percent change value (e.g. 0.2) reported by the BLS. Revisions to the Underlying made after Expiration will not be accounted for in determining the Expiration Value.

**Instructions:** The Underlying can be accessed [here](#).<sup>1</sup> A schedule of release dates is available on the BLS website ([here](#)), and the data is released at 8:30am ET.<sup>2</sup> Each month’s report is available at [this](#) stable URL, which automatically displays the latest available report. The Underlying for a given month is typically listed in the first sentence of the third paragraph of the first page of the monthly report under the heading “CONSUMER PRICE INDEX-[Month/Year]”. For example, in the CPI report for April 2022, the first sentence of the third paragraph is “The index for all items less food and energy rose 0.6 percent in April...” so 0.6 percent would be the value for the month of April 2022. Historical reports from prior months are available on the Bureau of Labor Statistics website [here](#). If you select the year in question, links to CPI reports from months in that year will be displayed. These instructions on how to access the Underlying are provided for convenience only and are not part of the binding Terms and Conditions of the Contract. They may be clarified at any time.

**Source Agency:** The Source Agency is the Bureau of Labor Statistics.

**Type:** The type of Contract is a Binary Contract.

**Issuance:** The Contract is based on the outcome of a recurrent data release, which is issued on a monthly basis. Thus, Contract iterations will be issued on a recurring basis, and future Contract iterations will generally correspond to a given calendar year. The Exchange may add new strike values of <percent> as market conditions change.

**<percent>:** Kalshi may list iterations of the Contract with <percent> levels that fall within an inclusive range between 0 and 500 at consecutive increments of 0.1. Due to the potential for variability in the Underlying, the Exchange may modify <percent> levels in response to suggestions by Members.

---

<sup>1</sup> <https://www.bls.gov/cpi/>

<sup>2</sup> [https://www.bls.gov/schedule/news\\_release/cpi.htm](https://www.bls.gov/schedule/news_release/cpi.htm)

**<month>**: <month> refers to a calendar month specified by Kalshi. Kalshi may list iterations of the Contract corresponding to variations of <month>.

**Payout Criterion:** The Payout Criterion for the Contract encompasses the Expiration Values that contain a value that is <above/below/between> <percent>. If the value of <above/below/between> is “between”, then <percent> shall be a pair of percents and the Payout Criterion encompasses the Expiration Values that are greater than or equal to the lesser of the pair, and less than or equal to the greater of the pair.

**Minimum Tick:** The Minimum Tick size for the referred Contract shall be \$0.01.

**Position Limit:** The Position Limit for the \$1 referred Contract shall be ~~\$25,000~~7,000,000 per Member.

**Last Trading Date:** The Last Trading Date of the Contract will be the date of the scheduled data release for <month>. The Last Trading Time will be 8:25 AM ET.

**Settlement Date:** The Settlement Date of the Contract shall be no later than the day after the Expiration Date, unless the Market Outcome is under review pursuant to Rule 7.1.

**Expiration Date:** The Expiration Date of the Contract shall be the sooner of the date of the first 10:00 AM ET following the release of data for <month>, or one week after the data release was scheduled to occur.

**Expiration time:** The Expiration time of the Contract shall be 10:00 AM ET.

**Settlement Value:** The Settlement Value for this Contract is \$1.00.

**Expiration Value:** The Expiration Value is the value of the Underlying as documented by the Source Agency on the Expiration Date at the Expiration time.

**Contingencies:** Before Settlement, Kalshi may, at its sole discretion, initiate the Market Outcome Review Process pursuant to Rule 6.3(c) of the Rulebook. Additionally, as outlined in Rule 7.2 of the Rulebook, if any event or any circumstance which may have a material impact on the reliability or transparency of a Contract’s Source Agency or the Underlying related to the Contract arises, Kalshi retains the authority to designate a new Source Agency and Underlying for that Contract and to change any associated Contract specifications after the first day of trading.