

**SUBMISSION COVER SHEET**

**IMPORTANT:** Check box if Confidential Treatment is requested

Registered Entity Identifier Code (optional): 23-329

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

Filing as a:  DCM  SEF  DCO  SDR

Please note - only ONE choice allowed.

Filing Date (mm/dd/yy): 08/15/23 Filing Description: Amendments to the Block Trade Minimum Quantity Threshold for Foreign Exchange ("FX") Inter-Commodity Option Combinations

**SPECIFY FILING TYPE**

Please note only ONE choice allowed per Submission.

**Organization Rules and Rule Amendments**

- Certification § 40.6(a)
- Approval § 40.5(a)
- Notification § 40.6(d)
- Advance Notice of SIDCO Rule Change § 40.10(a)
- SIDCO Emergency Rule Change § 40.10(h)

Rule Numbers: See filing.

**New Product**

Please note only ONE product per Submission.

- Certification § 40.2(a)
- Certification Security Futures § 41.23(a)
- Certification Swap Class § 40.2(d)
- Approval § 40.3(a)
- Approval Security Futures § 41.23(b)
- Novel Derivative Product Notification § 40.12(a)
- Swap Submission § 39.5

**Product Terms and Conditions (product related Rules and Rule Amendments)**

- Certification § 40.6(a)
- Certification Made Available to Trade Determination § 40.6(a)
- Certification Security Futures § 41.24(a)
- Delisting (No Open Interest) § 40.6(a)
- Approval § 40.5(a)
- Approval Made Available to Trade Determination § 40.5(a)
- Approval Security Futures § 41.24(c)
- Approval Amendments to enumerated agricultural products § 40.4(a), § 40.5(a)
- "Non-Material Agricultural Rule Change" § 40.4(b)(5)
- Notification § 40.6(d)

Official Name(s) of Product(s) Affected:

Rule Numbers:

August 15, 2023

**VIA ELECTRONIC PORTAL**

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

**Re: CFTC Regulation 40.6(a) Certification. Amendments to the Block Trade Minimum Quantity Threshold for Foreign Exchange (“FX”) Inter-Commodity Option Combinations.  
 CME Submission No. 23-329**

Dear Mr. Kirkpatrick:

Chicago Mercantile Exchange Inc. (“CME” or “Exchange”) certifies to the Commodity Futures Trading Commission (“CFTC” or “Commission”) amendments to the block trade minimum quantity threshold for all foreign exchange (“FX”) inter-commodity option combinations (collectively, the “Contracts”) such that the sum of the quantities of the legs of the transaction must meet the larger of the threshold requirements for block trades as detailed in Exhibit A below (collectively, the “Rule Amendments”) effective on Sunday, September 10, 2023 for trade date Monday, September 11, 2023.

**Exhibit A**  
**Block Minimum Thresholds Table**

Additions are highlighted in red underline; deletions are highlighted in ~~red strikethrough~~.

**Block Trade Minimum Thresholds and Reporting Times for Spreads and Combination Transactions**

	<b>CME and CBOT Products</b>	<b>NYMEX and COMEX Products</b>
<b><u>Intra-Commodity Options</u></b> Spreads and <b><u>Options</u></b> Combinations	<p><i>Each leg of the spread</i> must meet the designated minimum quantity threshold.</p> <p>** Exceptions apply in:</p> <p>i) Foreign Exchange Options; and;</p> <p>ii) Dairy Options.</p>	<p>The <i>sum</i> of the quantities of the legs of the transaction must meet the minimum block quantity threshold</p>

<p><b><u>Inter-Commodity Options Spreads and Options Combinations</u></b></p>	<p><i>Each leg of the spread must meet the larger of the threshold requirements for the underlying products.</i></p> <p>**** Exceptions apply in:</p> <p>i) Short Term Interest Rate Options;</p> <p>ii) Dairy Options; <del>and</del></p> <p>iii) Select Grain Options.; <u>and</u></p> <p><u>iv) Foreign Exchange Options.</u></p>	<p>The <i>sum</i> of the quantities of the legs of the transaction must meet the <i>larger</i> of the threshold requirements for the underlying products</p>
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**\*\* Exception for Intra-Commodity Options Spreads and Options Combinations**

i) Intra-Commodity Foreign Exchange Options

For intra-commodity Foreign Exchange options spreads and options combinations, the sum of the quantities of the legs of the transaction must meet the minimum block quantity threshold.

**\*\*\*\* Exception for Inter-Commodity Options Spreads and Options Combinations**

iv) Inter-Commodity Foreign Exchange Options

For inter-commodity Foreign Exchange options spreads and options combinations, the sum of the quantities of the legs of the transaction must meet the larger of the threshold requirements for the underlying products

The Rule Amendments are intended to harmonize the block trade minimum quantity threshold levels of FX Intra- and Inter-Commodity option combinations.

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

- **Availability of General Information:** The Exchange shall disseminate a Special Executive Report (“SER”) that sets forth information with regard to specifications, terms, and conditions of the Contracts. In addition to such SER, daily trading volume, open interest, and price information for the Contracts shall be published on the Exchange’s website.
- **Daily Publication of Trading Information:** The Exchange shall publish trading volumes, open interest levels, and price information daily of the transactions on the CME Group website.
- **Compliance with Rules:** The Exchange will continue its normal practice to establish, monitor, and enforce compliance with the rules of the transactions.

Pursuant to Section 5c(c) of the Act and CFTC Regulation 40.6(a), the Exchange certify that the Rule Amendments comply with the Act, including regulations under the Act. There were no substantive opposing views to this proposal.

The Exchange certifies that this submission has been concurrently posted on the Exchange's website at <http://www.cmegroup.com/market-regulation/rule-filings.html>.

Should you have any questions concerning the above, please contact the undersigned at (212) 299-2200 or via e-mail at [CMEGSubmissionInquiry@cmegroup.com](mailto:CMEGSubmissionInquiry@cmegroup.com).

Sincerely,

/s/ Christopher Bowen  
Managing Director and Chief Regulatory Counsel