September 2, 2026

Submitted via CFTC Portal

Division of Market Oversight
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, D.C. 20581

Re: Amendments to ForecastEx Rulebook Regarding Block Trades

Pursuant to Commodity Exchange Act ("CEA") Section 5c and Commodity Futures Trading Commission ("CFTC") Regulation 40.6(a) ForecastEx LLC ("ForecastEx", the "Exchange", or the "Clearinghouse") is making amendments to its Rulebook to go into effect on September 17, 2026.

ForecastEx is making amendments to its Rulebook in order to allow for Block Trading under specifically described circumstances defined in new Rule 418.

ForecastEx will maintain procedures for the submission, review, and processing of Block Trades. A Block Trade submission must contain sufficient information for the Exchange to identify the applicable Contract, expiration, price, quantity, counterparties and accounts, and the time at which the parties agreed to the transaction. Upon receipt, the Exchange will validate that the transaction is in an eligible Contract, satisfies the applicable minimum Block Trade threshold, contains all required information, and has been submitted within the applicable reporting period. Transactions that fail an applicable validation will be rejected, flagged for review, or otherwise handled in accordance with Exchange procedures. The Exchange will maintain records of the time the Block Trade was received and processed.

Prior to submitting a Block Trade on behalf of a Customer, an FCM Member must have a reasonable basis for determining that the Customer is eligible to participate in the Block Trade pursuant to Rule 417. ForecastEx may rely upon representations made by its FCM Members concerning Customer eligibility, subject to the Exchange's authority to request supporting information. For Members entering Block Trades on a proprietary basis, ForecastEx will determine their eligibility based off of the financial statements of the Member required under Rule 502.

ForecastEx is setting a default minimum block trade quantity of 25,000 contracts. This amount represents a quantity that Market Participants would be unlikely to be able to execute absent a Block Trade given ForecastEx's current liquidity conditions. ForecastEx will periodically review applicable Block Trade thresholds to determine whether they remain appropriate in light of trading activity, liquidity, typical transaction sizes, order-book depth, and other relevant market characteristics. The Compliance Department may recommend changes to an applicable threshold when it determines that the existing threshold no longer appropriately distinguishes transactions of sufficient size to warrant block treatment.

The Compliance Department will review Block Trades to identify transactions executed at prices that may not be fair and reasonable in light of prevailing market conditions. The review may consider the contemporaneous best Bids and available depth in the Contract, recent transactions in the Contract, the size of the Block Trade, prices in economically related markets, the time remaining until Contract expiration or settlement, prevailing volatility, and other circumstances relevant to the transaction.

Eligible parties may privately negotiate a transaction intended to be submitted as a Block Trade. Such negotiations do not constitute impermissible prearrangement under Rule 509(g)(1), provided that the resulting transaction satisfies all requirements applicable to Block Trades. If the transaction does not qualify as a Block Trade, the parties may not rely upon Rule 417(h) to execute a prearranged transaction through the regular market.

Block Trades remain subject to the Exchange's ordinary market-surveillance and disciplinary authority and are not exempt from manipulation, wash-trading, disruptive-trading, insider-trading, or other applicable rules merely because they occur away from the central order book.

ForecastEx certifies that the proposed amendments comply with the Commodity Exchange Act (“CEA”) and CFTC regulations. ForecastEx further certifies that a copy of the 40.6 filing has been posted to the ForecastEx Website.

ForecastEx has reviewed the Core Principles for Designated Contract Markets (“DCMs”) and has determined that the amendments may relate to the following Core Principles.

CFTC Regulation 38.150 – Compliance With Rules: This core principle requires that contract markets establish monitor and enforce compliance with their rules. ForecastEx is creating specifically designed rules under which Block Trades should be executed.

CFTC Regulation 38.250 – Prevention of Market Disruption: This core principle requires that the contract market prevent market disruptions. ForecastEx’s block trade rules require comprehensive and accurate trade reconstruction and the Exchange has methods for conducting real-time monitoring of block trading.

CFTC Regulation 38.400 – Availability of General Information: This core principle requires that the Contract Market publish the rules regulations, and mechanisms for executing transactions. ForecastEx is updating its rulebook with Block Trade rules.

CFTC Regulation 38.500 – Execution of Transactions: This core principle requires that the contract market provide a competitive, open, and efficient market mechanism for executing transactions. ForecastEx is amending its market maker program which supports the objective of maintaining continuous two-sided markets which supports efficient markets.

CFTC Regulation 38.550 – Trade Information: This core principle requires that the board of trade maintain rules and procedures to provide for the recording and safe storage of identifying trade information. Rule 418 details the information that must be maintained for block trades.

ForecastEx has reviewed the Core Principles for Derivatives Clearing Organizations (“DCOs”) and has determined that the amendments may relate to the following Core Principles.

CFTC Regulation 39.12 – Participant and Product Eligibility: This core principle requires that a clearinghor organization accept or reject swaps executed non-competitively on or subject to the rules of a DCM as quickly as possible after submission as technologically practicable. ForecastEx’s block trades will involve the same contracts already eligible for clearing, will be processed through the same clearing systems and applicable risk filters as competitively executed transactions.

CFTC Regulation 39.20 – Recordkeeping: ForecastEx will maintain records of Block Trades cleared by the DCO in accordance with its existing recordkeeping requirements, and Rule 417 additionally requires Members to maintain specified records regarding Block Trade orders, execution, and negotiations.

CFTC Regulation 39.21 – Public Information: The requirements governing Block Trades will be set forth in ForecastEx's publicly available Rulebook, and the Amendments do not otherwise alter ForecastEx's existing public-information obligations.

No substantive opposing views were offered in response to this submission.

If there are any questions regarding the submission please contact me at gdeese@forecastex.com.

Respectfully Submitted,

Graham Deese

Graham Deese
Chief Regulatory Officer

<u>Attachments:</u>

Exhibit A – ForecastEx LLC Rulebook
Exhibit B – ForecastEx LLC Rulebook - Redline