



Via Portal Submission

September 29, 2026  
MIAx Futures DCM Submission No. 26-89

Mr. Christopher J. Kirkpatrick  
Secretary of the Commission  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street NW  
Washington, DC 20581

**RE: Rule Certification Submission Pursuant to CFTC Regulation 40.6(a): Implementation of the MIAx Futures Di-Ammonium Phosphate (DAP) NOLA Futures Market Maker Program**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c) of the Commodity Exchange Act ("CEAct") and Commodity Futures Trading Commission ("CFTC") Regulation 40.6(a), MIAx Futures Exchange, LLC ("MIAx Futures" or "Exchange") hereby notifies the CFTC of its intention to adopt and implement the MIAx Futures Di-Ammonium Phosphate (DAP) NOLA Futures Market Maker Program ("Program"). The Program will be implemented on trade date October 19, 2026 for the MIAx Futures Di-Ammonium Phosphate NOLA Futures Contract (the "Product"). The purpose of the Program is to promote and incentivize participation in the newly launched Product, thereby developing the market and liquidity during its early formation.

Exhibit 1 sets forth the terms of the new Program. A complete description of the Program is included in Exhibit 2, for which the Exchange seeks confidential treatment.

MIAx Futures has reviewed the Core Principles for designated contract markets ("DCM Core Principles") and identified that the Program may impact the following DCM Core Principles:

- *DCM Core Principle 2, Compliance with Rules:* The Program is established pursuant to existing MIAx Futures Rule 2.1.9. Participants in the Program will be selected by the Exchange using criteria as stated in Exhibit 1, which are impartial, transparent, and nondiscriminatory towards all participants that meet the eligibility requirements. MIAx Futures will monitor Program participants' activity to ensure proper distribution of earned incentives.
- *DCM Core Principle 3, Contracts Not Readily Subject to Manipulation:* Participation in the Program, as well as all trading on the Exchange, is subject to the MIAx Futures Rulebook, which includes explicit prohibitions against wash trading, manipulative devices and practices, fraud, and fictitious transactions. MIAx Futures does not believe the terms of the Program render the Product readily susceptible to manipulation.
- *DCM Core Principle 4, Prevention of Market Disruption:* The Program will not impact MIAx Futures' ability to perform its trade practice and market surveillance obligations under the CEA, CFTC Regulations, and its Rules. MIAx Futures will monitor trading in the Program to prevent manipulative trading and market abuse.
- *DCM Core Principle 7, Availability of General Information:* MIAx Futures certifies that this submission and public Exhibit 1 will be posted on the Exchange's website, thereby making available to market authorities, market participants, and the public accurate information concerning the terms and conditions of the Program.

**MIAx FUTURES EXCHANGE, LLC**

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- *DCM Core Principle 9, Execution of Transactions:* The Product included in this Program will be listed for trading in the open and competitive market. The Program does not impact order execution priority or otherwise give any participant an execution preference or advantage.
- *DCM Core Principle 12, Protection of Markets and Market Participants:* The Program is subject to MIAx Futures Rules, which includes prohibitions against abusive practices, including fraudulent, noncompetitive, or unfair actions.
- *DCM Core Principle 16, Conflicts of Interest:* No affiliate of MIAx Futures will participate in the Program. Therefore, the Program will have no impact on MIAx Futures' ability to minimize conflicts of interest in its decision-making process nor on its ability to implement processes to manage conflicts of interest effectively.
- *DCM Core Principle 18, Recordkeeping:* All potential participants in the Program must complete an application to be eligible for the Program, which MIAx Futures will keep on file. The Program is subject to MIAx Futures' record retention policies, which comply with the CEA and CFTC Regulations.
- *DCM Core Principle 19, Antitrust Considerations:* The terms of the Program, attached hereto as Exhibits 1 and 2, are short, fixed, and transparent. Additionally, the Program will not involve any action that results in any unreasonable restraint of trade or impose any material anticompetitive burden on trading on the Exchange. The terms of the Program do not restrict participants from accessing or trading any contracts listed on the Exchange. Participation in the Program is voluntary and open to all eligible participants on equal terms.
- *DCM Core Principle 21, Financial Resources:* Incentives will be funded from Exchange resources. The Program will not negatively impact MIAx Futures' compliance with CFTC Regulation 38.1101 or any other applicable financial-resource requirements.

The Program will be implemented for trade date October 19, 2026. This letter and public Exhibit 1 will be posted on the Exchange's website. If there are any questions regarding this submission, please contact me at (612) 321-7176 or [jkrause@miaxglobal.com](mailto:jkrause@miaxglobal.com). Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Krause", written over a light blue horizontal line.

James D. Krause  
Associate Counsel

Enclosure

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