OneChicago ✕

March 18, 2016

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

> Re: OneChicago, LLC Security Futures Product Rule Submission
> Amending Position Limits for Certain Security Futures Products
> (OCX Submission Number 16-005)

Dear Mr. Kirkpatrick:

Pursuant to section 5c(c)(1) of the Commodity Exchange Act, as amended (the "Act"), and § 41.24(a) of the regulations promulgated by the Commodity Futures Trading Commission ("CFTC" or the "Commission") under the Act, OneChicago, LLC ("OneChicago," "OCX," or the "Exchange") hereby submits the following security futures product rule amendment, which will become effective on March 21, 2016.

Section 41.25(a)(3) of the Commission's regulations establishes speculative position limits for security futures products. Pursuant to that section, designated contract markets ("DCMs") must adopt position limits of 13,500 contracts for security futures products, but may adopt increased position limits (or Position Accountability) when the underlying security meets certain criteria. Those criteria are related to the average daily trading volume and the number of shares outstanding for the underlying security. OneChicago has recalculated the position limits for its security futures products based on these criteria, and is amending position limits for the following products:

Underlying Symbol	Name	Previous Position Limit	New Position Limit
S	Sprint Corp.	PA	22,500
VXX	iPath S&P 500 VIX Short-Term Futures ETN	22,500	PA

OneChicago is concurrently amending Schedule A to Chapter 4 of the OneChicago Rulebook ("Schedule A"). Schedule A lists the OneChicago products for which the position limits are either 22,500 or Position Accountability, and is being amended to reflect the new position limits

established by the table above. The proposed amendments to Schedule A are enclosed as Attachment A.

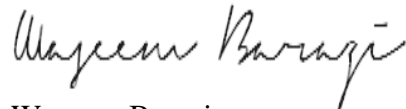<p style="text-align:center">*   *   *</p>

The purpose and effect of the rule amendment is to set position limits for OneChicago products in accordance with § 41.25 of the Commission's regulations. Comments on this security futures rule amendment have not been solicited and none have been received. OneChicago is not aware of any substantive opposing views to this rule amendment. OneChicago certifies that the rule amendment complies with the Act, including the core principles, and the Commission's regulations promulgated thereunder. OneChicago further certifies that a copy of this submission has been posted on the OneChicago website.

OneChicago staff has reviewed the core principles applicable to DCMs, and has concluded that the proposed rule amendment may have some bearing upon the following core principles:

Core Principle 5: Core Principle 5 requires that a DCM adopt position limitations or position accountability to reduce the potential threat of market manipulation or congestion. This rule amendment supports Core Principle 5 in that it adjusts position limits for OneChicago products pursuant to Commission regulation § 41.25.

If you have any questions or comments related to this filing, please feel free to contact me by telephone at (312) 883-3441 or through e-mail at wbarazi@onechicago.com.

Respectfully Submitted,

Waseem Barazi
Chief Regulatory Officer and Associate General Counsel

Encl: Attachment A

Attachment A

Schedule A to Chapter 4*

Underlying Symbol	Security Name	Position Limit**	Position Accountability***	Unit / Multiplier
AA	Alcoa Inc.		22,500	100
AAPL	Apple Inc.		22,500	100
ABX	Barrick Gold Corp.	22,500		100
BAC	Bank Of America Corp		22,500	100
C	Citigroup, Inc.	22,500		100
CHK	Chesapeake Energy Corp	22,500		100
CSCO	Cisco Systems, Inc.		22,500	100
F	Ford Motor Company		22,500	100
FB	Facebook, Inc.		22,500	100
FCX	Freeport McMoRan Inc.		22,500	100
GE	General Electric Company		22,500	100
INTC	Intel Corporation		22,500	100
ITUB	Itau Unibanco Holding S.A.	22,500		100
MSFT	Microsoft Corporation		22,500	100
MU	Micron Technology Inc.		22,500	100
NFLX	Netflix, Inc.	22,500		100
PBR	Petróleo Brasileiro S.A		22,500	100
PFE	Pfizer		22,500	100
RAD	Rite Aid Corp.	22,500		100
S	Sprint Corp	<u>22,500</u>	~~22,500~~	100
SUNE	SunEdison, Inc.	22,500		100
T	AT&T Corporation		22,500	100
TWTR	Twitter, Inc.	22,500		100
VALE	Vale S.A.		22,500	100
Exchange Traded Funds				
EEM	iShares MSCI Emerging Markets Index		22,500	100
EFA	iShares MSCI EAFE Index Fund	22,500		100
EWJ	iShares MSCI Japan ETF		22,500	100
EWZ	iShares MSCI Brazil Capped ETF	22,500		100
FXI	iShares China Large-Cap		22,500	100
GDX	Market Vectors Gold Miners ETF		22,500	100
IWM	iShares Russell 2000 Index Fund		22,500	100
QQQ	PowerShares QQQ		22,500	100
SPY	SPDR S&P 500 ETF Trust		22,500	100
USO	United States Oil ETF		22,500	100
VWO	Vanguard FTSE Emerging Markets ETF	22,500		100

VXX	iPath S&P 500 VIX Short-Term Futures ETN	~~22,500~~	<u>22,500</u>	100
XLF	Financial Select Sector SPDR		22,500	100
	*Positions are aggregated for all classes for the same underlying security			
	**Generally, the position limits for single stock futures are no greater than 13,500 contracts net long or short during the last five trading days of an expiring contract month. The products listed here qualify for higher position/accountability limits. See, OCX Rule 414.			
	*** Position Accountability Rule 414(g): The Exchange has adopted this position accountability rule for security futures products where the average daily trading volume in the underlying security exceeds 20 million shares and there are more than 40 million shares of the underlying security outstanding. A Person owning or controlling more than a specified number of futures contracts net long or short in all contract months combined, as set forth in this Schedule A, must provide, in a timely fashion, upon request by the Exchange: a) Information regarding the nature of the position b) Trading strategy c) Hedging information if applicable, and consent to halt increasing their positions when so ordered by the Exchange			
	Securities that are not included in the above table are those: a) With a multiplier of 100, the position limit = 13,500 b) With a multiplier of 1000, the position limit = 1,350			