



Via Portal Submission

June 17, 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 16-013)

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 June 20, 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:

<b>Underlying Symbol</b>	<b>Name</b>	<b>Previous Position Limit</b>	<b>New Position Limit</b>
AMD	Advanced Micro Devices, Inc.	13,500	22,500
RIG	Transocean Ltd.	13,500	22,500
X	United States Steel Corp.	13,500	22,500
SWN	Southwestern Energy Company	PA	22,500
DUST	Direxion Daily Gold Miners Bear 3X ETF	PA	13,500

Underlying Symbol	Name	Previous Position Limit	New Position Limit
AMLP	Alerian MLP ETF	22,500	13,500
ORCL	Oracle Corporation	22,500	13,500
XOM	Exxon Mobil Corporation	22,500	13,500

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.

\* \* \*

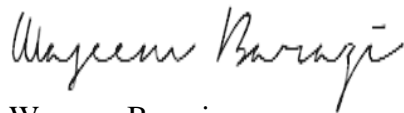
The purpose and effect of the rule amendment is to set position limits for OneChicago products in accordance with § 41.25 of the Commission’s regulations. Comments on this security futures rule amendment have not been solicited and none have been received. OneChicago is not aware of any substantive opposing 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](mailto:wbarazi@onechicago.com).

Respectfully Submitted,



Waseem Barazi  
Chief Regulatory Officer and Associate General Counsel

Encl: Attachment A  
Attachment B

## 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
ABEV	Ambev S.A.	22,500		100
ABX	Barrick Gold Corp.		22,500	100
<u>AMD</u>	<u>Advanced Micro Devices, Inc.</u>	<u>22,500</u>		<u>100</u>
BAC	Bank Of America Corp		22,500	100
BBD	Banco Bradesco S.A. ADR	22,500		100
C	Citigroup, Inc.		22,500	100
CHK	Chesapeake Energy Corp		22,500	100
CSCO	Cisco Systems, Inc.		22,500	100
ECA	EnCana Corp.	22,500		100
ETE	Energy Transfer Equity, L.P.		22,500	100
F	Ford Motor Company		22,500	100
FB	Facebook, Inc.		22,500	100
FCX	Freeport McMoRan Inc.		22,500	100
FTR	Frontier Communications Corp.	22,500		100
GE	General Electric Company		22,500	100
HPQ	HP, Inc.	22,500		100
INTC	Intel Corporation		22,500	100
ITUB	Itau Unibanco Holding S.A.	22,500		100
JCP	J.C. Penney Co., Inc.	22,500		100
JPM	JPMorgan Chase & Co.	22,500		100
KMI	Kinder Morgan, Inc.		22,500	100
MRO	Marathon Oil Corp.		22,500	100
MS	Morgan Stanley	22,500		100
MSFT	Microsoft Corporation		22,500	100
MT	ArcelorMittal	22,500		100
MU	Micron Technology Inc.		22,500	100
NFLX	Netflix, Inc.	22,500		100
<del>ORCL</del>	<del>Oracle Corp.</del>	<del>22,500</del>		<del>100</del>
PBR	Petróleo Brasileiro S.A		22,500	100
PFE	Pfizer		22,500	100
RF	Regions Financial Corp.		22,500	100
<u>RIG</u>	<u>Transocean Ltd.</u>	<u>22,500</u>		<u>100</u>
S	Sprint Corp	22,500		100
SIRI	Sirius XM Holdings, Inc.		22,500	100

SUNE	SunEdison, Inc.		22,500	100
SWN	Southwestern Energy Co.	<u>22,500</u>	<u>22,500</u>	100
T	AT&T Corporation		22,500	100
TWTR	Twitter, Inc.		22,500	100
VALE	Vale S.A.		22,500	100
VRX	Valeant Pharmaceuticals Intl, Inc.		22,500	100
VZ	Verizon Communications, Inc.	22,500		100
WFC	Wells Fargo & Co.	22,500		100
WFT	Weatherford Intl Ltd	22,500		100
WLL	Whiting Petroleum Corp.		22,500	100
<u>X</u>	<u>United States Steel Corp.</u>	<u>22,500</u>		<u>100</u>
<del>XOM</del>	<del>Exxon Mobil Corp.</del>	<del>22,500</del>		<del>100</del>
YHOO	Yahoo!, Inc.	22,500		100
<b>Exchange Traded Funds</b>				
AMLP	Alerian MLP ETF	22,500		100
<del>DUST</del>	<del>Direxion Daily Gold Miners Bear 3X Shares</del>		<del>22,500</del>	<del>100</del>
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
UVXY	ProShares Ultra VIX Short -Term Futures		22,500	100
VWO	Vanguard FTSE Emerging Markets ETF	22,500		100
VXX	iPath S&P 500 VIX Short-Term Futures ETN		22,500	100
XLE	SPDR Energy Select Sector ETF		22,500	100
XLF	Financial Select Sector SPDR		22,500	100
XLU	SPDR Utilities Select Sector ETF	22,500		100
XOP	SPDR S&P Oil & Gas Exploration & Production ETF		22,500	100
	*Positions are aggregated for all classes for the same underlying security			

	<p>**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.</p>			
	<p>*** 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:</p> <ul style="list-style-type: none"> <li>a) Information regarding the nature of the position</li> <li>b) Trading strategy</li> <li>c) Hedging information if applicable, and consent to halt increasing their positions when so ordered by the Exchange</li> </ul>			
	<p>Securities that are not included in the above table are those:</p> <ul style="list-style-type: none"> <li>a) With a multiplier of 100, the position limit = 13,500</li> <li>b) With a multiplier of 1000, the position limit = 1,350</li> </ul>			

**Attachment B**

(See Following Page)

Date: June 17, 2016  
Re: June 2016 Position Limits Rebalancing  
Effective Date: June 20, 2016

OneChicago, LLC (“OneChicago”) is issuing this Regulatory Release (“RR”) 2016-15 to inform market participants that OneChicago has amended its position limits in accordance with the below table:

<b>Underlying Symbol</b>	<b>Name</b>	<b>Previous Position Limit</b>	<b>New Position Limit</b>
AMD	Advanced Micro Devices, Inc.	13,500	22,500
RIG	Transocean Ltd.	13,500	22,500
X	United States Steel Corp.	13,500	22,500
SWN	Southwestern Energy Company	PA	22,500
DUST	Direxion Daily Gold Miners Bear 3X ETF	PA	13,500
AMLP	Alerian MLP ETF	22,500	13,500
ORCL	Oracle Corporation	22,500	13,500
XOM	Exxon Mobil Corporation	22,500	13,500

\* \* \*

Any questions regarding this RR can be directed to Waseem Barazi, Chief Regulatory Officer and Associate General Counsel by email at [wbarazi@onechicago.com](mailto:wbarazi@onechicago.com) or through phone at (312) 883-3441.