

SUBMISSION COVER SHEET

IMPORTANT: Check box if Confidential Treatment is requested

Registered Entity Identifier Code (optional): 22-313

Organization: Commodity Exchange, Inc. ("COMEX")

Filing as a: **DCM** **SEF** **DCO** **SDR**

Please note - only ONE choice allowed.

Filing Date (mm/dd/yy): 07/19/22 **Filing Description:** Amendments to the Position Limit, Position Accountability and Reportable Level Table Located in COMEX Chapter 5 ("Trading Qualifications and Practices")

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:

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: See filing.

Rule Numbers: See filing.

July 19, 2022

VIA ELECTRONIC PORTAL

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

Re: CFTC Regulation 40.6(a) Certification. Administrative Amendments to the Position Limit, Position Accountability and Reportable Level Table Located in Chapter 5 (“Trading Qualifications and Practices”) of the COMEX Rulebook. COMEX Submission No. 22-313

Dear Mr. Kirkpatrick:

Commodity Exchange, Inc. (“COMEX” or “Exchange”) certifies to the Commodity Futures Trading Commission (“CFTC” or “Commission”) various administrative amendments to the COMEX Position Limit, Position Accountability and Reportable Level Table located in COMEX Chapter 5 (“Trading Qualifications and Practices”) (the “Table”) effective on August 3, 2022.

As a result of a comprehensive audit of the Table, the Exchange identified typographical errors as more specifically detailed below (collectively, the “Rule Amendments”). There is no operational impact as a result of the Rule Amendments.

The Exchange is correcting administrative errors in the Initial Spot-Month Limit (In Net Futures Equivalents) Leg (1) / Leg (2) and Spot-Month Limit (In Contract Units) Leg (1) / Leg (2) columns (the “columns”) for U.S. Midwest Domestic Steel Premium (CRU) Futures contract (Commodity Code: HDG) (the “Contract”). [Appendix A & B](#) of COMEX Submission No. [21-370](#) dated September 8, 2021 shows that the Initial Spot-Month Limit (In Net Futures Equivalents) Leg (1) / Leg (2) for U.S. Midwest Domestic Hot-Rolled Coil Steel (CRU) Index Futures (Commodity Code: HR) was amended from 3,000 to 4,000 and the Spot-Month Limit (In Contract Units) Leg (1) / Leg (2) column was amended from 60,000 to 80,000 effective on September 23, 2021 and commencing with the November 2021 contract month and beyond. Leg 2 of U.S. Midwest Domestic Steel Premium (CRU) Futures aggregates into U.S. Midwest Domestic Hot-Rolled Coil Steel (CRU) Index Futures and the aforementioned columns in the Table were not updated after COMEX Submission No. 21-370 was effective. The Initial Spot-Month Limit (In Net Futures Equivalents) Leg (1) / Leg (2) column has been updated from 3,000 to 4,000 for Leg 2 of the contract. The Spot-Month Limit (In Contract Units) Leg (1) / Leg (2) column was updated from 60,000 to 80,000 for the Contract.

Exhibit A, which appears under separate cover, provides amendments to the Table with additions underscored and deletions ~~struck through~~.

The Exchange 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:

Core Principle 2 – Compliance with Rules: Trading in the Contracts will continue to be subject to COMEX Rulebook Chapter 4, which includes prohibitions against fraudulent, noncompetitive, unfair, and abusive practices. Additionally, trading in these Contracts will be subject to the

Exchange's trade practice rules, the majority of which are contained in Chapter 5 and Chapter 8 of the Rulebook. Trading activity in the Contracts will be subject to monitoring and surveillance by the Exchange's Market Regulation Department, which has the authority to exercise its investigatory and enforcement power where potential rule violations are identified.

Core Principle 3 – Contracts Not Readily Subject to Manipulation: The Contracts are based on a cash price series that is reflective of the underlying cash market and is commonly relied on and used as a reference price by cash market brokers and commercial market participants.

Core Principle 5 –Position Limits or Accountability: The speculative position limits for the Contracts shall remain consistent with the Commission's guidance as a result of the Rule Amendments. There is no operational impact as a result of the Rule Amendments

Core Principle 7 – Availability of General Information: The Exchange will disseminate a Market Surveillance Notice ("MSN") that sets forth information in regard to the Rule Amendments.

Core Principle 13 – Disciplinary Procedures: COMEX Rulebook Chapter 4 provides for the Exchange to discipline, suspend, or expel members or market participants who violate the rules of the Exchange. Trading in the Contracts is subject to these provisions. The Exchange's Market Regulation Department has the authority to exercise its powers of enforcement, in the event that rule violations in these products are identified.

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

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

If you require any additional information, please contact the undersigned at (212) 299-2200 or via e-mail at CMEGSubmissionInquiry@cmegroup.com.

Sincerely,

/s/ Christopher Bowen
Managing Director and Chief Regulatory Counsel

Attachment: Exhibit A – COMEX Rulebook Chapter 5 COMEX Position Limit, Position Accountability and Reportable Level (attached under separate cover) (blackline format)

Exhibit A

COMEX Rulebook

Chapter 5

Position Limit, Position Accountability and Reportable Level Table

(additions underlined, deletions ~~overstruck~~)
(attached under separate cover)