Bloomberg SEF LLC New Contract Submission 2013-09-P34 September 30, 2013

- 1. The Contract's terms and conditions are attached as Attachment A.
- 2. The intended listing date is October 2, 2013.
- 3. Attached, please find a certification that: (a) the Contract complies with the Act and the Commission regulations thereunder; and (b) concurrent with this submission, BSEF posted on its website: (i) a notice of pending certification of this Contract with the Commission; and (ii) a copy of this submission.

EXPLANATION AND ANALYSIS OF THE CONTRACT'S COMPLIANCE WITH APPLICABLE CORE PRINCIPLES AND COMMISSION REGULATIONS

As required by Commission Regulation § 40.2(a), the following analysis, in the form of narrative and explanatory charts, demonstrates that the Contract is consistent with the requirements of the Act and the Commission regulations and policies thereunder (in particular, Appendix B to Part 37 and Appendix C to Part 38, respectively).

<u>Appendix B to Part 37—Demonstration of Compliance That a Contract Is Not Readily</u> <u>Susceptible to Manipulation</u>

Core Principle 3 of Section 5h of the Act—Swaps Not Readily Susceptible to Manipulation. The swap execution facility shall permit trading only in swaps that are not readily susceptible to manipulation.

(a) Guidance.

(1) In general, a swap contract is an agreement to exchange a series of cash flows over a period of time based on some reference price, which could be a single price, such as an absolute level or a differential, or a price index calculated based on multiple observations. Moreover, such a reference price may be reported by the swap execution facility itself or by an independent third counterparty. When listing a swap for trading, a swap execution facility shall ensure a swap's compliance with Core Principle 3, paying special attention to the reference price used to determine the cash flow exchanges. Specifically, Core Principle 3 requires that the reference price used by a swap not be readily susceptible to manipulation. As a result, when identifying a reference price, a swap execution facility should either: Calculate its own reference price using suitable and well-established acceptable methods or carefully select a reliable third-party index.

(2) The importance of the reference price's suitability for a given swap is similar to that of the final settlement price for a cash-settled futures contract. If the final settlement price is

manipulated, then the futures contract does not serve its intended price discovery and risk management functions. Similarly, inappropriate reference prices cause the cash flows between the buyer and seller to differ from the proper amounts, thus benefitting one counterparty and disadvantaging the other. Thus, careful consideration should be given to the potential for manipulation or distortion of the reference price.

Reference Price Not Readily Susceptible to Manipulation

This Contract, a fixed-to-floating commodity swap, is a cash-settled agreement between two counterparties to exchange a fixed price on a designated commodity ("reference commodity") for a floating price on a designated futures contract on the reference commodity, at a given date (or date range, as explained below) in the future ("calculation period"). The fixed leg is thus determined at the start of the Contract and remains unchanged throughout the life of the swap. The floating leg, however, is based on the price of the designated futures contract for the reference price for the Contract is the price of the applicable futures contract. The source for the futures contract price will be the prices published by the respective exchanges (see below): London Metal Exchange, BM&F Bovespa, and the CME Group. This price is not readily susceptible to manipulation since, as the exchanges are self-regulatory organizations ("SROs"), futures data from these sites is reliable, widely-accepted, and publicly available.

(3) For swaps that are settled by physical delivery or by cash settlement refer to the guidance in appendix C to part 38 of this chapter—Demonstration of Compliance That a Contract is not Readily Susceptible to Manipulation, section b(2) and section c(4), respectively.

<u>Appendix C to Part 38 - Demonstration of Compliance That a Contract Is Not Readily</u> <u>Susceptible to Manipulation</u>

(c) Futures Contracts Settled by Cash Settlement. (1) Cash settlement is a method of settling certain futures or option contracts whereby, at contract expiration, the contract is settled by cash payment in lieu of physical delivery of the commodity or instrument underlying the contract. An acceptable specification of the cash settlement price for commodity futures and option contracts would include rules that fully describe the essential economic characteristics of the underlying commodity (e.g., grade, quality, weight, class, growth, issuer, maturity, source, rating, description of the underlying index and index's calculation methodology, etc.), as well as how the final settlement price is calculated. In addition, the rules should clearly specify the trading months and hours of trading, the last trading day, contract size, minimum price change (tick size) and any limitations on price movements (e.g., price limits or trading halts).

Essential Economic Characteristics of the Contract

Terms

The terms and conditions of the Contract are in Attachment A, including:

Contract Overview	A fixed/floating swap contract is a cash settled agreement between two counterparties whereby one counterparty agrees to pay a fixed amount to the other counterparty on a given date, and in exchange the second counterparty will pay a floating amount to the first counterparty on the same given date. The fixed amount paid is determined based on the notional quantity traded and the price of the reference commodity. The floating amount paid is determined based on the notional quantity and the price of an applicable futures contract based on the reference commodity over an agreed future calculation period.
Reference	• Zinc
Commodities	Aluminum
	Aluminum Alloy
	• Copper
	• Nickel
	• Tin
	• Lead
	• Steel Billet
	Live Cattle
	• Corn
	• Wheat
	• Copper
	• Gold
	• Silver
	Henry Hub Natural Gas
	Waha Natural Gas
	Permian Natural Gas Basis Swap
	New York Harbor Heating Oil
	• WTI Crude
	Palladium Distinguis
	Platinum
	Iron Ore Constil
	GasoilBrent Crude
	 TTF Natural Gas
Contracts on	LME Zinc
Reference	 LME Zhić LME Aluminum
Commodities	LME Aluminum Alloy
	 LME Copper
	LME Copper LME Nickel
	LME Tin
	LME Lead
	LME Steel Billet
	 BM&F Bovespa Live Cattle

	CBOT Corn
	CBOT Com CBOT Wheat
	NYMEX Henry Hub Natural Gas (Index Swap Future)
	NYMEX Waha Natural Gas Basis Swap
	NYMEX Permian Natural Gas Basis Swap
	NYMEX New York Harbor Heating Oil
	NYMEX WTI Crude
	NYMEX Palladium
	NYMEX Platinum
	NYMEX Iron Ore
	COMEX Copper
	COMEX Gold
	COMEX Silver ICE Gasoil (Monthly)
	• ICE Brent Crude (Monthly)
	 ICE TTF Natural Gas (Monthly)
Settlement Currency	Currency in which payments are made between the two counterparties:
Settlement Currency	 USD
	• EUR
	• CAN
	• JPY
	• CHF
	• BRL
	• PLN
	• SEK
	• KRW
Quoting Convention	Notional amount, as agreed by the counterparties.
and Minimum	
Increment	
Minimum Size	Notional amount, as agreed by the counterparties.
Notional Currency	Currency in which the fixed and floating prices are quoted:
	• USD
	• EUR
	• GBP
	• CAN
	• JPY
	• CHF
	• BRL
	PLN
	• SEK
	• KRW
Trading Conventions	
Trading Conventions	Buy or Sell which refers to whether or not the fixed amount is paid (buy) or received (sell)
Coloulation Dariad	(buy) or received (sell).
Calculation Period	Can be a single date or date range over which the reference price of the

	commodity will be calculated. If a date range the reference price will be
	averaged across all days.
Trade Date	The date on which counterparties enter into the contract.
Settlement Date	Specified settlement or payment date when the fixed payment amount
	and the floating payment amount are exchanged (can be netted)
Settlement Procedure	Bilateral cash settlement performed in settlement currency.
Trading Hours	00:01 – 24:00 Sunday-Friday (Eastern Time).
Block Size	As set forth in Appendix F to Part 43 of the Commission's Regulations.
Speculative Limits	As set forth in Part 151 of the Commission's Regulations.
Reportable Levels	As set forth in Commission's Regulation §15.03.

As described above, this is a commodity swaps contract in which the counterparties exchange a fixed price on a reference commodity (see list above and in Attachment A) and a floating price based on a futures contract on the reference commodity (see list above and in Attachment A) at a specified future date. This Contract has several flexible terms. For instance, counterparties are able to choose the commodities on which to base the Contract, from a list of commodities (see above and Attachment A). Counterparties are also able to choose the currency (from a list of currencies above and in Attachment A) on which the notional value and the settlement value, respectively, will be based. Moreover, counterparties are able to choose whether the floating price will be the price of the futures contract on a single date or the average price over a specified date range. (If the counterparties choose the latter, the price would be averaged across all of the days.) Other flexible terms include the Contract's: notional amount, minimum size, and settlement date. The trading hours, however, are fixed at twenty-four hours, Sunday -Friday (ET). The Contract is not readily susceptible to manipulation because, though the Contract has many flexible terms, all of the essential terms, except for the floating price, are agreed upon at the start of the Contract. And, as noted above, the floating price is based on the price of the futures contract which is available through the respective exchanges – reliable and widely accepted sources.

Contract Not Readily Susceptible to Manipulation

The Contract is not susceptible to manipulation for a number of reasons. First, as noted above, all of the essential terms of the Contract are agreed upon at the start of the Contract and remain static throughout the life of the swap, except for the floating price. And, as noted, the floating price is based on the price of the applicable futures contract, which is available directly from the respective exchanges – reliable and widely accepted sources. Second, as indicated by volume data for futures contracts on the respective products, ¹ the underlying markets are very liquid –

¹ Futures contracts on London Metal Exchange commodities (year-to-date 2013 volume / August 2013 volume): (1) LME Zinc – 20,211,351 / 2,517,101; (2) LME Aluminum – 45,009,648 / 5,261,657 lots; (3) LME Aluminium Alloy – 410,140 / 48,036 lots; (4) LME Copper – 29,679,845 / 3,519,782; (5) LME Nickel – 8665891 / 1053362; (6) LME Tin – 1394095 / 181664; (7) LME Lead – 8686432 / 1043216; and (8) LME Steel Billet – 65840 / 3280; current data *available at* http://www.lme.com/metals/reports/monthly-volumes/. Futures contracts on BM&F Bovespa Live Cattle (trading volume on 9/27/2013 / financial volume on 9/27/13) – 5,476 / \$88,415,189, *current data* available at http://www.bmfbovespa.com.br/shared/iframe.aspx?altura=1200&idioma=en-

us&url=www2.bmf.com.br/pages/portal/bmfbovespa/boletim2/resumoOperacoes2.asp. Futures contracts on CBOT commodities (year-to-date 2013 volume / August 2013 volume): (1) CBOT Corn - 45,232,627 / 6,128,160; and (2) CBOT Wheat – 18,232,894 / 2,487,001; current data *available at* http://www.cmegroup.com/market-data/volume-

making manipulation very difficult to achieve. Also, BSEF has a robust market surveillance program that is effectively able to surveil this market, detect uncommon activity, and investigate any such activity for signs of manipulation.

Calculation of Cash Settlement Price

As described above, the cash settlement price will be calculated thusly:

- (a) On the last day of the calculation period which could be either a single date or the last day of a date range, depending on the determination of the counterparties – the floating price will be determined based on the price of the futures contract for the reference commodity. If the counterparties choose to use a date range, the average across all of the days in the range will be used.
- (b) The counterparties will then calculate the difference between the fixed price on the reference commodity (determined at the start of the Contract) and the floating price, and multiply that difference by the notional amount based on the notional currency that the counterparties designated at the start of the Contract.
- (c) On the settlement date, which is also designated at the start of the Contract, the counterparties will exchange payment amounts (which can be netted) in the settlement currency, on which they agreed at the start of the Contract.

This method of cash settlement is consistent with the customary practice of cash-settling commodity swaps contracts in the market.

2) Cash settled contracts may be susceptible to manipulation or price distortion. In evaluating the susceptibility of a cash-settled contract to manipulation, a designated contract market should consider the size and liquidity of the cash market that underlies the listed contract in a manner that follows the determination of deliverable supply as noted above in (b)(1). In particular, situations susceptible to manipulation include those in which the volume of cash market transactions and/or the number of participants contacted in determining the cash-settlement price are very low. Cash-settled contracts may create an incentive to manipulate or artificially influence the data from which the cash-settlement price is derived or to exert undue influence on the cash-settlement price's computation in order to profit on a futures position in that commodity.

open-interest/. NYMEX/COMEX commodities (year-to-date 2013 / August 2013): (1) NYMEX Henry Hub Natural Gas (Index Swap Future) - 85,328 / 9,700; (2) NYMEX Waha Natural Gas Basis Swap - 3,272 / 544; (3) NYMEX Permian Natural Gas Basis Swap - 1,327 / 62; (4) NYMEX New York Harbor Heating Oil - 44,871 / 5,690; (5) NYMEX WTI Crude - 270,600 / 33,326; (6) NYMEX Palladium 1,051,589 / 163,892; (7) NYMEX Platinum - 2,205,916 / 216,194; (8) NYMEX Iron Ore - futures 13,061 / 1,686; (9) COMEX Copper - 12,584,441- 1,696,652; (10) COMEX Gold - 34,149,696 / 3,466,673; and (11) COMEX Silver - 10,441,033 / 1,652,477. Futures based on ICE products (year-to-date 2013 total volume / year-to-date 2013 average daily volume): (1) ICE Gasoil (Monthly) - 49,875,288 / 266,713; (2) ICE Brent Crude (Monthly) - 121,562,391 / -650,066; and (3) ICE TTF Natural Gas (Monthly) 138,770 / 742; current data *available at*

https://www.theice.com/marketdata/reports/ReportCenter.shtml?reportId = 28& productId = 254& hubId = 403 # report/28

The utility of a cash-settled contract for risk management and price discovery would be significantly impaired if the cash settlement price is not a reliable or robust indicator of the value of the underlying commodity or instrument. Accordingly, careful consideration should be given to the potential for manipulation or distortion of the cash settlement price, as well as the reliability of that price as an indicator of cash market values. Appropriate consideration also should be given to the commercial acceptability, public availability, and timeliness of the price series that is used to calculate the cash settlement price. Documentation demonstrating that the settlement price index is a reliable indicator of market values and conditions and is commonly used as a reference index by industry/market agents should be provided. Such documentation may take on various forms, including carefully documented interview results with knowledgeable agents.

As noted above, the Contract operates in liquid commodity markets with many participants. Also, as noted above, the cash settlement price is not easily susceptible to manipulation or distortion as the method of determining the price is based on (a) factors that are fixed at the start of the contract, and (b) a reliable reference price.

(3) Where an independent, private-sector third counterparty calculates the cash settlement price series, a designated contract market should consider the need for a licensing agreement that will ensure the designated contract market's rights to the use of the price series to settle the listed contract.

(i) Where an independent, private-sector third counterparty calculates the cash settlement price series, the designated contract market should verify that the third counterparty utilizes business practices that minimize the opportunity or incentive to manipulate the cash-settlement price series. Such safeguards may include lock-downs, prohibitions against derivatives trading by employees, or public dissemination of the names of sources and the price quotes they provide. Because a cash-settled contract may create an incentive to manipulate or artificially influence the underlying market from which the cash-settlement price is derived or to exert undue influence on the cash-settlement computation in order to profit on a futures position in that commodity, a designated contract market should, whenever practicable, enter into an information-sharing agreement with the third-party provider which would enable the designated contract market to better detect and prevent manipulative behavior.

As the information on the price of futures contracts is publicly available, a licensing agreement is not necessary. Moreover, as the exchanges are SROs, they have robust provisions in place to prevent market manipulation, including comprehensive surveillance and continual oversight of their employees.

(ii) Where a designated contract market itself generates the cash settlement price series, the designated contract market should establish calculation procedures that safeguard against potential attempts to artificially influence the price. For example, if the cash settlement price is derived by the designated contract market based on a survey of cash market sources, the designated contract market should maintain a list of such entities which all should be reputable sources with knowledge of the cash market. In addition, the sample of

sources polled should be representative of the cash market, and the poll should be conducted at a time when trading in the cash market is active.

Please see above regarding the calculation of the cash settlement price.

(iii) The cash-settlement calculation should involve computational procedures that eliminate or reduce the impact of potentially unrepresentative data.

(iv) The cash settlement price should be an accurate and reliable indicator of prices in the underlying cash market. The cash settlement price also should be acceptable to commercial users of the commodity contract. The registered entity should fully document that the settlement price is accurate, reliable, highly regarded by industry/market agents, and fully reflects the economic and commercial conditions of the relevant designated contract market.

Please see above regarding the calculation of the cash settlement price.

(v) To the extent possible, the cash settlement price should be based on cash price series that are publicly available and available on a timely basis for purposes of calculating the cash settlement price at the expiration of a commodity contract. A designated contract market should make the final cash settlement price and any other supporting information that is appropriate for release to the public, available to the public when cash settlement is accomplished by the derivatives clearing organization. If the cash settlement price is based on cash prices that are obtained from non-public sources (e.g., cash market surveys conducted by the designated contract market or by third counterparties on behalf of the designated contract market), a designated contract market should make available to the public as soon as possible after a contract month's expiration the final cash settlement price as well as any other supporting information that is appropriate or feasible to make available to the public.

Please see above regarding the calculation of the cash settlement price. The cash settlement price is publicly available on exchanges' websites.

(4) Contract terms and conditions requirements for futures contracts settled by cash settlement.

(i) An acceptable specification of the terms and conditions of a cash-settled commodity contract will also set forth the trading months, last trading day, contract size, minimum price change (tick size) and daily price limits, if any.

As described above, the contract terms are attached as Attachment A. As noted above, while there are common terms such as the trading hours, many of the terms are flexible. Nevertheless, the terms are all within commonly accepted market norms.

(A) Commodity Characteristics: The terms and conditions of a commodity contract should describe the commodity underlying the contract.

The terms and conditions of the Contract specifically list the commodities on which counterparties can choose to base the Contract.

(B) Contract Size and Trading Unit: An acceptable specification of the trading unit would be a contract size that is consistent with customary transactions in the cash market. A designated contract market may opt to set the contract size smaller than that of standard cash market transactions.

The size of the Contract is as determined by the counterparties, which is consistent with customary transactions in the market.

(C) Cash Settlement Procedure: The cash settlement price should be reliable, acceptable, publicly available, and reported in a timely manner as described in paragraphs (c)(3)(iv) and (c)(3)(v) of this appendix C.

The cash settlement procedure and an explanation of how it is not readily susceptible to manipulation, is described above.

(D) Pricing Basis and Minimum Price Fluctuation (Minimum Tick): The minimum price increment (tick) should be set a level that is equal to, or less than, the minimum price increment commonly observed in cash market transactions for the underlying commodity. Specifying a futures' minimum tick that is greater than the minimum price increment in the cash market can undermine the risk management utility of the futures contract by preventing hedgers from efficiently establishing and liquidating futures positions that are used to hedge anticipated cash market transactions or cash market positions.

As determined by the counterparties.

(E) Maximum Price Fluctuation Limits: Designated contract markets may adopt price limits to: (1) Reduce or constrain price movements in a trading day that may not be reflective of true market conditions but might be caused by traders overreacting to news; (2) Allow additional time for the collection of margins in times of large price movements; and (3) Provide a "cooling-off" period for futures market participants to respond to bona fide changes in market supply and demand fundamentals that would lead to large cash and futures price changes. If price-limit provisions are adopted, the limits should be set at levels that are not overly restrictive in relation to price movements in the cash market for the commodity underlying the futures contract. For broad-based stock index futures contracts, rules should be adopted that coordinate with New York Stock Exchange ("NYSE") declared Circuit Breaker Trading Halts (or other market coordinated Circuit Breaker mechanism) and would recommence trading in the futures contract only after trading in the majority of the stocks underlying the index has recommenced.

As determined by the counterparties.

(F) Last Trading Day: Specification of the last trading day for expiring contracts should be established such that it occurs before publication of the underlying third-party price index or determination of the final settlement price. If the designated contract market chooses to allow trading to occur through the determination of the final settlement price, then the designated contract market should show that futures trading would not distort the final settlement price calculation.

The last trading day will be the last day of the calculation period, which is set by the individual counterparties.

(G) Trading Months: Trading months should be established based on the risk management needs of commercial entities as well as the availability of price and other data needed to calculate the cash settlement price in the specified months. Specification of the last trading day should take into consideration whether the volume of transactions underlying the cash settlement price would be unduly limited by occurrence of holidays or traditional holiday periods in the cash market. Moreover, a contract should not be listed past the date for which the designated contract market has access to use a proprietary price index for cash settlement.

As noted above, netted payments will be made on the settlement date in accordance with the cash settlement method described above. No payments are made prior to the settlement date.

(H) Speculative Limits: Specific rules and policies for speculative position limits are set forth in part 150 and/or part 151, as applicable, of the Commission's regulations.

BSEF will comply with Parts 150 and 151 of the Commission's regulations.

(I) Reportable Levels: Refer to § 15.03 of the Commission's regulations.

BSEF will adhere to the applicable reporting levels set forth in § 15.03 of the Commission's regulations.

(J) Trading Hours: Should be set by the designated contract market to delineate each trading day.

The Contract is traded twenty-four hours a day (00:01 - 24:00), Sunday to Friday (ET).

CERTIFICATIONS PURSUANT TO SECTION 5c OF THE COMMODITY EXCHANGE ACT, 7 U.S.C. §7A-2 AND COMMODITY FUTURES TRADING COMMISSION REGULATION 40.2, 17 C.F.R. §40.2

I hereby certify that: 1) the "Commodities – Fixed/Floating Swap Contract" complies with the Commodity Exchange Act, 7 U.S.C. §1 *et seq.* and regulations thereunder; and 2) concurrent with this submission, Bloomberg SEF LLC posted on its website: (a) a notice of pending certification of this Contract with the Commission; and (b) a copy of this submission.

Gr¢gd Dunia lr√

Title: Chlef Compliance Officer Date: September 30, 2013

Attachment A Terms and Conditions

[see attached]

Commodities:

Fixed/Floating Swap Contract Specifications

Contract Overview	A fixed/floating swap contract is a cash settled agreement between two counterparties whereby one counterparty agrees to pay a fixed amount to the other counterparty on a given date, and in exchange the second counterparty will pay a floating amount to the first counterparty on the same given date. The fixed amount paid is determined based on the notional quantity traded and the price of the reference commodity. The floating amount paid is determined based on the notional quantity and the price of an applicable futures contract based on the reference commodity over an agreed future calculation period.
Reference	• Zinc
Commodities	Aluminum
	Aluminum Alloy
	Copper
	Nickel
	• Tin
	• Lead
	• Steel Billet
	Live Cattle
	• Corn
	Wheat
	• Copper
	• Gold
	• Silver
	Henry Hub Natural Gas
	Waha Natural Gas
	Permian Natural Gas Basis Swap
	New York Harbor Heating Oil
	WTI Crude
	Palladium
	Platinum
	Iron Ore
	• Gasoil
	Brent Crude
	TTF Natural Gas

Contracts on ReferenceLME ZincCommoditiesLME AluminumCommoditiesLME Aluminum AlloyLME CopperLME NickelLME TinLME LeadLME Steel Billet	
Commodities• LME Aluminum Alloy• LME Copper• LME Nickel• LME Tin• LME Lead	
 LME Copper LME Nickel LME Tin LME Lead 	
 LME Nickel LME Tin LME Lead 	
LME TinLME Lead	
LME Lead	
BM&F Bovespa Live Cattle	
CBOT Corn	
CBOT Wheat	
 NYMEX Henry Hub Natural Gas (Index Swap Future) 	
NYMEX Waha Natural Gas Basis Swap	
NYMEX Permian Natural Gas Basis Swap	
NYMEX New York Harbor Heating Oil	
NYMEX WTI Crude	
NYMEX Palladium	
NYMEX Platinum	
NYMEX Iron Ore	
COMEX Copper	
COMEX Gold	
COMEX Silver ICE Gasoil (Monthly)	
ICE Brent Crude (Monthly)	
ICE TTF Natural Gas (Monthly)	
Settlement Currency in which payments are made between the two counterparties:	
Currency • USD	
• EUR	
• GBP	
• CAN	
• JPY	
• CHF	
• BRL	
• PLN	
• SEK	
• KRW	
Quoting Notional amount, as agreed by counterparties	
Convention	
and Minimum Increment	
Minimum Size Notional amount, as agreed by counterparties	

Notional	Currency in which the fixed and floating prices are quoted:
Currency	• USD
	• EUR
	• GBP
	• CAN
	• JPY
	• CHF
	BRL
	PLN
	• SEK
—	• KRW
Trading	Buy or Sell which refers to whether or not the fixed amount is paid (buy) or received
Conventions	(sell)
Calculation	Can be a single date or date range over which the reference price of the commodity
Period	will be calculated. If a date range the reference price will be averaged across all
	days.
Trade Date	The date on which counterparties enter into the contract
Settlement Date	Specified settlement or payment date when the fixed payment amount and the
Settlement Date	floating payment amount are exchanged (can be netted)
Settlement	Bilateral cash settlement performed in settlement currency
Procedure	
Trading Hours	00:01 -24:00 Sunday-Friday Eastern Time
Block Size	As set forth in Appendix F to Part 43 of the CFTC Regulations.
Speculative	As set forth in Part 151 of the CFTC Regulations
Limits	
Reportable	As set forth in CFTC Regulation 15.03
Levels	

Currency list:

AED UAE Dirham AFN Afghanistan Afghani ALL Albanian Lek AMD Armenia Dram ANG Neth. Ant. Guilder AOA Angolan Kwanza ARS Argentine Peso (NDF) **ARS Argentine Peso** AUD Australian Dollar AWG Aruban Guilder BAM Bosnia-Herze Convrt Mrka **BBD Barbados Dollar BDT Bangladesh Taka BGN Bulgarian Lev BHD** Bahraini Dinar **BIF Burundi Franc BMD** Bermudian Dollar **BND** Brunei Dollar **BOB Bolivian Boliviano** BRL Brazilian Real (NDF) **BSD Bahamas Dollar BWP Botswana Pula BYR Belarus Ruble BZD Belize Dollar** CAD Canadian Dollar **CDF** Congolese Franc **CHF Swiss Franc CLF Chilean UF CLP Chilean Peso** CNY China Renminbi (NDF) **COP** Colombian Peso **CRC Costa Rican Colon CVE Cape Verde Escudo** CZK Czech Koruna DJF Djibouti Franc **DKK Danish Krone** DOP Dominican Repb. **DZD** Algerian Dinar EGP Egyptian Pound (NDF) ERN Eritrean Nakfa **EUR Euro** FJD Fiji Dollar **GBP** British Pound **GEL Georgia Lari**

GMD Gambian Dalasi **GNF** Guinea Franc GTQ Guatemala Quetzal GYD Guyana Dollar **HKD Hong Kong Dollar HNL Honduras Lempira HRK Croatia Kuna** HTG Haiti Gourde **HUF Hungarian Forint** IDR Indonesian Rupiah (NDF) **ILS Israeli Shekel** INR Indian Rupee (NDF) **ISK Iceland Krona** JMD Jamaica Dollar JOD Jordanian Dinar JPY Japanese Yen **KES Kenyan Shilling** KGS Kyrgyzstan Som KHR Cambodia Riel **KMF** Comoros Franc KRW South Korean Won (NDF) KWD Kuwaiti Dinar **KYD** Cayman Islands Dollar **KZT Kazakhstan Tenge** LAK Laos Kip LBP Lebanese Pound LKR Sri Lankan Rupee LTL Lithuanian Litas LVL Latvian Lats MAD Moroccan Dirham MDL Moldova Leu MGA Malagascy Ariary MKD Macedonia Denar MMK Myanmar Kyat **MNT Mongolian Togrog** MOP Macau Pataca MRO Mauritania Ouguiya **MUR Mauritius Rupee MVR Maldives Rufiyaa** MWK Malawi Kwacha MXN Mexican Peso MYR Malaysian Ringgit (NDF) MZM Mozambigue Metical MZN New Mozambique Metical NGN Nigeria Naira (NDF) NID New Iraqi Dinar

NIO Nicaragua Cordoba NLG Dutch Guilder NOK Norwegian Krone NPR Nepalese Rupee NZD New Zealand Dollar OMR Omani Rial PAB Panamanian Balboa PEN Peruvian New Sol PGK Papua N.G. Kina PHP Philippines Peso (NDF) PKR Pakistani Rupee PLN Polish Zloty PTE Portuguese Escudo PYG Paraguay Guarani QAR Qatari Riyal ROL Romanian Leu RON New Romanian Leu **RSD Serbian Dinar** RUB Russian Ruble (NDF) **RWF Rwanda Franc** SAR Saudi Rival SBD Solomon Is. Dollar SCR Seychelles Rupee SDD Sudanese Dinar **SDG New Sudanese Pound** SDP Old Sudanese Pound SEK Swedish Krona SGD Singapore Dollar SIT Slovenia Tolar SKK Slovakia Koruna SLL Sierra Leone Leone SOS Somali Shilling SRD Suriname Dollar SSP South Sudanese Pound STD Sao Tome Dobra SVC El Salvador Colon THB Thai Baht THO Thai Baht Onshore TJS Tajikistan Somoni **TND** Tunisian Dinar **TOP Tonga Pa'Anga** TRY Turkish Lira TTD Trinidad/Tobago Dol TWD Taiwan Dollar (NDF) TZS Tanzanian Shilling UAH Ukraine Hryvnia (NDF)

UDI Mexican UDI UGX Ugandan Shilling USD US Dollar USDCLF CHILEAN UNIDAD SP x10000 UYU Uruguay Peso UZS Uzbekistan Sum VEE Venezuela Essential Rate VEF Venezuelan Bolivar VND Vietnamese Dong (NDF) VUV Vanuatu Vatu WST Samoa (West) Tala XAF CFA Franc Beac XCD East Caribbean Dollar **XDR Special Drawing Rights XOF CFA Franc Bceao** XPF Pacific Island Franc XSU Sucre YER Yemeni Rial ZAR S. African Rand ZMK Zambian Kwacha ZMW Zambian Kwacha (NDF) ZWR Zimbabwe Dollar