

OneChicago ✕

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Via Electronic Mail

October 5, 2011

Mr. David Stawick
Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: Security Futures Products Rule Submission and Rule Certification
Revisions to OneChicago Rule 902

Dear Mr. Stawick:

Pursuant to section 5c(c)(1) of the Commodity Exchange Act, as amended (the "Act"), and section 41.24 of the regulations promulgated by the Commission under the Act, submitted herewith is new Appendix A and Appendix B to Chapter 9 that more completely describes the OCX.NoDivRisk™ product including examples in Appendix A.

The proposed revisions are included as Attachment A. Deleted text is shown by a strikethrough (---) and new text is underlined (___). These amendments will become effective on October 21, 2011. The proposed new Appendix A to Chapter 9 fully describes the adjustment process that has been used for all OCX.NoDivRisk products since their launch in 2010. The same adjustment process has been in use for special dividends for the non-OCX.NoDivRisk products.

The proposed new Appendix B to Chapter 9 provides an overview of the features that are unique to the OCX.NoDivRisk products. These features were described in a previously issued Frequently Asked Questions document as well as posted on our website. Appendix B adds additional information regarding the treatment of canceled dividends that was not contained in the previously published Frequently Asked Questions.

Both new appendices are consistent with the Core Principles, in particular Core Principle 12 in that these specifications are ensuring the just and equitable treatment of market participants relative to the distributions by securities underlying the OCX.NoDivRisk futures.

There is no new operational impact related to Appendix A. The only operational effect of Appendix B is in the unusual case of a canceled distribution where the Exchange will need to notify OCC of the cancellation.

The adoption of Appendix A and Appendix B will not change the theoretical price for an OCX.NoDivRisk future.

Comments on the OneChicago proposed rule change have not been solicited and none have been received. The Regulatory Oversight Committee has reviewed and approved these changes.

On behalf of OneChicago, I hereby certify that a notice of pending rule certification with the Commission and a copy of the submission has been posted on the OneChicago website at http://www.onechicago.com/?page_id=8917

On behalf of OneChicago, I hereby further certify that the amendment complies with the Act and the regulations promulgated thereunder.

Respectfully submitted,

Thomas G. McCabe
Chief Operating Officer
OneChicago, LLC

Encl: Attachment A

Attachment A

Appendix A to Chapter 9

OCX.NoDivRisk™ Processing Example

- ABC1D futures settles at \$10.00 on the business day prior to ex-date.
- ABC stock closes at \$10.00 on the business day prior to ex-date.
- ABC stock is paying a \$0.25 dividend.
- On the business day prior to ex-date, the exchange notifies OCC of the adjustment amount and publishes an OCX.NoDivRisk Adjustment notice.
- On ex-date, OCC adjusts the prior business day's settlement for all ABC1D futures downward by the adjustment amount, which equals the sum of all distributions going "ex" that day. In this example, OCC adjusts the prior day's settlement price to \$9.75.

Appendix B to Chapter 9

OCX.NoDivRisk™ Products Specifications

As provided for in Rule 902(i), the exchange has designated OCX.NoDivRisk products as a class of security futures contracts that shall be adjusted for the aggregate amount of all cash dividends or distributions and shall be reported by the Exchange to the Clearing Corporation as prescribed in their By-Laws. OCX.NoDivRisk products are identified by a “D” as the ending character in the OneChicago symbol.

The significant characteristics of OCX.NoDivRisk products are:

Canceled Distributions

If all or a portion of a distribution on an OCX.NoDivRisk underlying security is canceled between ex-date and pay date, the Exchange may reverse the original adjustment that was applied on the ex-date by directing OCC to adjust the prior business day’s settlement upward by the amount of the canceled distribution.

Capital Gains

Capital gains are adjusted for in the OCX.NoDivRisk products.

Cash or Stock distributions

The OCX.NoDivRisk product will be adjusted for the cash election in the same fashion that it adjusts for regular cash distributions.

Incorrect Distribution Amount

OneChicago publishes the distribution amount on its website and conveys the amount to the OCC. The exchange will correct any known errors up until the close of business on the ex-date. Any errors in the distribution amount identified post the close of business on the ex-date will not be corrected.

Non-Distribution Corporate Events

All non-distributions corporate events are handled the same between the traditional 1C product and the OCX.NoDivRisk product.

Rounding

All distributions are summed for the instrument for that day and then rounded to 4 decimals.

Special Dividends

Special dividends are adjusted for in the OCX.NoDivRisk products as well as our traditional 1C products.

Underlying Types-MLPs, Common Stock, REITS, ETFs, UITs, ETNs, etc

OCX.NoDivRisk products are adjusted for all cash distributions by the underlying security.

ADR Distributions

The OCX.NoDivRisk products overlaying ADRs are adjusted by the gross United States dollar value of the distribution as announced by the home country company on the declaration date.

The OCX.NoDivRisk adjustment may differ from the final United States dollar payment amount, which is normally caused by currency exchange rate fluctuations between the declaration date and the payment date.

For example:

Initial Announcement for ABC1D

<u>Announcement Date</u>	<u>7/31/10</u>
<u>Ex-Dividend Date</u>	<u>8/3/10</u>
<u>Approximate Amount</u>	<u>*\$2.0658 USD</u>

*OneChicago gross adjustment amount

Final Announcement for ABC1D

<u>Announcement Date</u>	<u>11/19/10</u>
<u>Payment Date</u>	<u>11/25/10</u>
<u>Actual Amount</u>	<u>\$2.3680 USD</u>