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November 6, 2008

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

RE: Section 5c(c)(1), Rules 40.6(a) – Exchange Certification for Rule Amendments to Standardize FX Fixing Price Methodologies. CME Submission 08-172.

Dear Mr. Stawick:

Chicago Mercantile Exchange Inc. ("CME" or "Exchange") hereby certifies with the Commission rule amendments to standardize its FX Fixing Price procedures by implementing the current 2:00 PM FX fixing price / settlement price procedures to the calculation of the 9:00 AM FX fixing prices, which are used for exercise of the European-style FX options at expiration (Appendix 1 summarizes the new 9:00 AM FX fixing price procedures). The Exchange certifies that these rule amendments to selected options on currency chapters comply with the Commodity Exchange Act and the rules thereunder. Also, the volume analysis supporting this action, suggested CME Group could now expand its European-style FX options offerings by launching European-style Options on Australian Dollar Futures contracts (see under separate cover, CME Submission #08-173 dated November 6, 2008, for exchange certification and rules for listing European-style Australian Dollar Options on Futures). CME Group intends to implement these enhancements to the 9:00 AM FX fixing prices starting Monday, December 15, 2008. Appendix 2 presents the rule revisions necessary to adopt the 2:00 PM fixing procedures for the 9:00 AM FX fixing prices with deletions bracketed and overstruck, and additions underlined. Appendix 3 is a clean copy of these rules.

Earlier this year, CME Group submitted for certification, several enhancements to the FX options product line.¹ The Exchange has intended to standardize the FX fixing price procedures by adopting the preferred 2:00 PM methodology for 9:00 AM at such time that it was feasible. The principal difference between the two procedures lies in the length of the interval over which the VWAP is calculated (as noted previously, Appendix 1 details the new 9:00 AM FX fixing price procedures). The 2:00 PM FX Fixing / Settlement Prices are sampled over a 30-second interval. The 9:00 AM FX Fixings are calculated over a 2-minute interval. As long as the underlying futures markets are liquid and deep enough to dissuade manipulation, market participants prefer fixing prices determined as close to the hour as practicable.

Over-the-counter ("OTC") FX option exercises are marked exactly to the 10:00 AM Eastern time (9:00 AM Central time) spot FX rates. The longer the CME Group FX futures fixing price calculation interval; the more potential for deviation from the OTC FX option benchmark. When CME Group's European-style FX options were first launched in 2005 and expanded in 2006, a two-minute VWAP calculation at 9:00 AM was considered to be a reasonable interval for specifying the volume-weighted average price for determining which expiring options are in the money and exercised. However, since that time, CME Group FX

¹ Including elimination the "pin risk" by forced exercise of expiring, in-the-money American-style FX options and the 30-second volumeweighted average price (VWAP) of underlying FX futures to determine which options were in and out of the money (also used as the nearby futures daily settlement price).

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volumes in the underlying futures contracts have increased generally and now CME Group staff has access to CME Globex depth of book data for additional analysis. CME Group believes these historical data suggest that a 30-second VWAP calculation can now be used for the 9:00 AM FX fixings. Data from a 30-second interval are displayed in the left-hand "Tier 1" section of Appendix 4 in the column labeled "VWAP" (Appendix 4 is attached separately). In addition to looking at simulated settlement prices, the analysis also calculated numbers of trades (Tier 1 "Ords" in Appendix 4) and volumes at these selected time intervals as well (30-second results displayed in "Tier 1" section of Appendix 4 in the column labeled "Qty").

There were only two instances for all six underlying FX futures across sixteen consecutive monthly expirations, where there were less than 3 trades during the proposed 30-second interval preceding 9:00 AM (exceptions were Australian dollar futures on August 8, 2008, where there was 1 trade and February 8, 2008, where there were 2 trades). In the situation of no trades, then the average of the CME Globex bid/ask spread midpoints are referenced for the FX fixing prices. For all of the six major FX futures contracts, there were CME Globex bid / ask prices available to reference a Tier 2 calculation for each of the last 16 monthly European-style FX options expirations. Further, Appendix 4 presents depth of CME Globex book data (5 levels deep with volumes indicated on the bid and ask) as well as summary statistics for number of orders and volumes of trading during the target 30 second interval.

CME Group believes that these statistics show that there is availability of standing bid and ask pricing to back up calculations of the 9:00 AM FX fixings, when the requisite Tier 1 trades are not met. For example, Appendix 4 shows that for Australian dollar futures sited above on Friday, August 8, 2008, in order to move the CME FX fixing price three ticks, on the bid side, a trader would have to hit the bids for 20 contracts and on the offer side, would have to lift the offer on 38 contracts. Similarly, on Friday, February 8, 2008, a trader would have to hit the bid for 21 contracts and lift the offer on 27 contracts to move the market three ticks. Also, adding Euro-style exercise Australian dollar options is very likely to result in increased futures trading in the 30-second interval prior to the 9:00 AM expiry, and thus further improve the reliability of the VWAP calculation in this currency. CME Group believes that these statistics demonstrate the viability of the new 9:00 AM FX fixing price procedures. Respectively, the following Tables 1 and 2 summarize selected data appearing in Appendix 4 for (1) numbers of trades (orders) and (2) volumes trades during the 30-second interval ending at 9:00 AM.

Members/shareholders will be notified of these new 9:00 AM FX fixing price procedures and the associated rule amendments in CME Group Special Executive Report, S-4785, dated Monday, November 10, 2008.

CME certifies that these changes comply with the Commodity Exchange Act and regulations thereunder.

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If you require any additional information regarding this action, please do not hesitate to contact Steve Youngren, at 312-930-4583 or via e-mail at Steve.Youngren@cmegroup.com or me at (312) 648-5422. Please reference our CME Submission #08-172 in any related correspondence.

Sincerely,

/s/ Stephen M. Szarmack Director and Associate General Counsel

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	EC,	yt 🥑	BP	CD 2	SF	AD :
Average*	73.50	46.38	43.88	23.25	34.13	14.44
Standard Deviation	73.65	38.53	36.04	24.34	38.64	14.63
High	279	151	139	105	151	49
Low	11	9	4	4	4	.
FX Options Terminations: 9/5/2008	64	37	71	15	15	49_
8/8/2008	138	36	51	5	24	1
7/3/2008	80	18	58	11	14	9
6/6/2008	40	30	13	42	80	9
5/9/2008	55	25	80	38	83	7
4/4/2008	67	59	39	24	12	17
3/7/2008	221	105	93	105	59	46
2/8/2008	_13	9	14	12	14	2
1/4/2008	17	13	4	.7	4	8
12/7/2007	38	9	32	8	12	3
11/9/2007	42	18	16	40	15	9
10/5/2007	38	50	16	20	11	19
9/7/2007	35	151	49	4	26	9
8/3/2007	38	37	15	7	6	6
7/6/2007	11	47	12	12	20	4
6/8/2007	279	98	139	22	151	33

Table 1. Summary of Numbers of Trades (Orders) at 30-Second Interval Ending at 9:00 AM

Table 2 Summan	v of Volume for Under	ving EX Eutures at	30-Second Interval Ending	n at 9·00 ΔM
Table L. Quillinal		ying i A i utulos a	L DO-DECONG INLEI VAI LIIUNI	1 at 3.00 Min

		SALENS CONTRACTOR		Plant Street Street	Sales States States	
	EC .	JY	S SEP	GD	SF	AD
Average*	376.31	239.38	166.44	75.63	146.00	39.44
Standard Deviation	602.78	261.35	185.95	106.06	227.34	38.94
High	2402	875	776	462	976	120
Low	34	23	4	5	5	. 2
FX Options Terminations: 9/5/2008	216	137	243	29	80	113
8/8/2008	· 488	97	105	7	59	3
7/3/2008	212	33	111	33	58	18
6/6/2008	95	61	24	105	212	27
5/9/2008	124	73	254	97	248	13
4/4/2008	290	213	144	51	28	56
3/7/2008	1325	415	289	462	242	109
2/8/2008	53	23	58	34	44	2
1/4/2008	<u>34</u>	40	4	18	5	22
12/7/2007	155	24	173	24	88	6
11/9/2007	83	74	38	108	27	18
10/5/2007	116	419	52	75	61	53
9/7/2007	178	782	320	5	136	37
8/3/2007	173	152	43	22	12	9
7/6/2007	77	412	29	29	60	25
6/8/2007	2402	875	776	111	976	120

*Data for underlying FX futures on past 16 monthly FX options termination dates.

Sources: Armada Database and CME Group Equity, FX & Alternative Investments Research

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Appendix 1

New 9:00 AM FX Fixing Price Procedures Summarized

- 1. "CME currency fixing price" calculation interval is 30 seconds (8:59:30 to 8:59:59)
- <u>Tier 1</u>: Volume-Weighted Average Price (VWAP) of underlying futures contract traded on CME Globex is calculated and disseminated on a real time basis during the 30-second interval ending at 9:00 AM. However, if less than three trades by the end of the interval, then go to Tier 2 for the CME Globex bid/ask data (therefore, for 2, 1 or zero trades in 30-second calculation interval, then Tier 2 applies).
- <u>Tier 2</u>: Calculate the midpoint of the bid/ask spread during the 30 seconds on a real time basis. Sample at least once per second (minimum of 30 observations). CME FX fixing price is the average of the midpoints. For liquid contracts, most of the time fixing prices will be determined via the Tier 1 procedures. If no bid/ask spreads are available during the 30second interval, then Tier 3 applies.
- 4. <u>Tier 3</u>: Use over-the-counter (OTC) vendor contributed spot rates and forward points to calculate synthetic futures "CME currency fixing prices." If there are no sales or bid and ask prices during the 30-second interval preceding 9:00 AM at the expiration of a European-style FX option contract, then Exchange staff will derive the CME currency fixing price as a synthetic futures price from quote vendor spot rates and appropriate maturity forward points. The price will be displayed on Merquote and the CME Website.

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Appendix 2

Approved Rule Amendments to Adopt the Current 2:00 PM CME FX Fixing Price / Settlement Price Procedures for the 9:00 AM FX Fixing Price Procedures for Options on Selected FX Futures.

Chapter 251A Options on British Pound Sterling Futures

Rules 251A00 through 251A03.A.1. are unchanged.

251A03.A.2. Exercise of European-Style Exercise Options

All in-the-money options are automatically exercised by the Clearing House on the day of expiration for the option. All out-ofthe-money options are abandoned by the Clearing House on the day of expiration for the option. To determine whether an option is in or out of the money on this day, the Exchange shall calculate the relevant "CME currency fixing price" from [pittraded-and] GLOBEX-traded underlying futures contracts as follows:

- Tier 1 Take the [two-minute] <u>30-second</u> average of sale (trade) prices, weighted by volume [where available,] from [8:58 to 9:00] 8:59:30 to 8:59:59 a.m. Central time on the day of determination of the CME currency fixing price.
- Tier 2 If <u>less than three or</u> no sales (trades) occurred during the [two-minute] <u>30-second</u> interval noted above, take the midpoint of each bid & ask spread where available and average the resulting midpoints over the [two-minute] <u>30-second</u> interval. [However, when looking at each bid / ask spread, if it is wider than a specified number of points (inputted variable, e.g., 3 points for Euro, 6 points for British pound, etc.), then ignore that average bid & ask pair in the calculation.]
- Tier 3 [If no_sales (trades) and no bid and ask prices occurred during the two-minute interval, then take the five-minute average of sale (trade) prices, weighted by volume where available, from 8:55 to 9:00 a.m. Central time.
- Tier 4 If no sales (trades) occurred during the five minute interval noted above, take the midpoint of each bid & ask spread where available and average the resulting midpoints over the five minute interval. However, when looking at each bid / ask spread, if it is wider than a specified number of points (inputted variable, e.g., 3 points for Euro, 6 points for British pound), then ignore that average bid & ask pair in the calculation.
- Tier 5] If no sales (trades) and no bid and ask prices occurred during the [five-minute] <u>30-second</u> interval, then Exchange staff shall [take-into-consideration any other information it deems appropriate to determine the CME currency fixing price for that day. This information may include, but is not limited to the following, and the procedures to determine the information may be performed in any order by Exchange staff: (1) repeat the steps described in Tiers 3 or 4 at ever increasing five minute-increments (e.g., intervals of 10, 15, 20, etc. minutes) until data is obtained; (2) derive the CME currency fixing price (as a synthetic futures price)[s] from quote vendor spot rates and appropriate maturity forward points[; and (3) set the CME currency fixing price using any other information or method deemed appropriate)

The calculation of the CME currency fixing price at Tiers 1 to [5] <u>3</u> shall be rounded to each contract's Price Increment's definition. For example, for Euro with a Price Increment of \$0.0001 per Euro, the CME currency fixing price shall be rounded to the nearest \$0.0001 per Euro (with \$0.00005 and above rounded up to \$0.0001, and \$0.00004 and below rounded down to \$0.0000).

An option is in the money if the CME currency fixing price of the underlying futures contract lies above the exercise price in the case of a call, or lies below the exercise price in the case of a put. For example, if the CME currency fixing price were 1.3051 or higher, then 1.3050 Calls shall be exercised. If the CME currency fixing price for Euro were 1.3050 or lower, then 1.3050 calls shall be abandoned. Similarly, if the CME currency fixing price were 1.3049 or lower, then 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be abandoned.

(Remainder of rules is unchanged)

Chapter 252A Options on Canadian Dollar Futures

Rules 252A00 through 252A03.A.1. are unchanged.

252A03.A.2. Exercise of European-Style Exercise Options

All in-the-money options are automatically exercised by the Clearing House on the day of expiration for the option. All outof-the-money options are abandoned by the Clearing House on the day of expiration for the option. To determine whether an option is in or out of the money on this day, the Exchange shall calculate the relevant "CME currency fixing price" from [pit-traded-and] GLOBEX-traded underlying futures contracts as follows:

Tier 1 Take the [two-minute] <u>30-second</u> average of sale (trade) prices, weighted by volume [where available,] from [8:58 to 9:00] 8:59:30 to 8:69:59 a.m. Central time on the day of determination of the CME currency fixing price.

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- Tier 2 If <u>less than three or</u> no sales (trades) occurred during the [two-minute] <u>30-second</u> interval noted above, take the midpoint of each bid & ask spread where available and average the resulting midpoints over the [two-minute] <u>30-second</u> interval. [However, when looking at each bid / ask spread, if it is wider than a specified number of points (inputted variable, e.g., 3 points for Euro, 6 points for British pound, etc.), then ignore that average bid & ask pair in the calculation.]
- Tier 3 [If no sales (trades) and no bid and ask prices occurred during the two-minute interval, then take the five-minute average of sale (trade) prices, weighted by volume where available, from 8:55 to 9:00 a.m. Central time.
- Tier 4 -- If no sales (trades) occurred during the five-minute interval noted above, take the midpoint of each-bid & ask spread where available and average the resulting midpoints over the five-minute interval. However, when looking at each bid / ask spread, if it is wider than a specified number of points (inputted variable, e.g., 3 points for Euro, 6 points for British pound), then ignore that average bid & ask pair in the calculation.
- Tier-5] If no sales (trades) and no bid and ask prices occurred during the [five-minute] <u>30-second</u> interval, then Exchange staff shall [take-into-consideration any other information it deems appropriate to determine the CME eurrency fixing price for that day. This information may include, but is not limited to the following, and the procedures to determine the information may be performed in any order by Exchange staff: (1) repeat the steps described in Tiers 3 or 4 at over increasing five-minute increments (e.g., intervals of 10, 15, 20, etc. minutes) until data is obtained; (2) derive the CME currency fixing price (as a synthetic futures price)[6] from quote vendor spot rates and appropriate maturity forward points[; and (3) set the CME currency fixing price-using any other information or method deemed appropriate].

The calculation of the CME currency fixing price at Tiers 1 to [5] <u>3</u> shall be rounded to each contract's Price Increment's definition. For example, for Euro with a Price Increment of \$0.0001 per Euro, the CME currency fixing price shall be rounded to the nearest \$0.0001 per Euro (with \$0.00005 and above rounded up to \$0.0001, and \$0.00004 and below rounded down to \$0.0000).

An option is in the money if the CME currency fixing price of the underlying futures contract lies above the exercise price in the case of a call, or lies below the exercise price in the case of a put. For example, if the CME currency fixing price were 1.3051 or higher, then 1.3050 Calls shall be exercised. If the CME currency fixing price for Euro were 1.3050 or lower, then 1.3050 calls shall be abandoned. Similarly, if the CME currency fixing price were 1.3049 or lower, then 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price in the currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price in the currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price in the currency fixing price in the currency fixing price in the currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price in the currency fixing price in the

(Remainder of rules is unchanged)

Chapter 253A Options on Japanese Yen Futures

Rules 253A00 through 253A03.A.1. are unchanged.

253A03.A.2. Exercise of European-Style Exercise Options

All in-the-money options are automatically exercised by the Clearing House on the day of expiration for the option. All outof-the-money options are abandoned by the Clearing House on the day of expiration for the option. To determine whether an option is in or out of the money on this day, the Exchange shall calculate the relevant "CME currency fixing price" from [pit-traded and]GLOBEX-traded underlying futures contracts as follows:

- Tier 1 Take the [two-minute] <u>30-second</u> average of sale (trade) prices, weighted by volume [where available,] from [8:58 to 9:00] 8:59:30 to 8:59:59 a.m. Central time on the day of determination of the CME currency fixing price.
- Tier 2 If less than three or no sales (trades) occurred during the [two-minute] 30-second interval noted above, take the midpoint of each bid & ask spread where available and average the resulting midpoints over the [two-minute] 30-second interval. [However, when looking at each bid / ask spread, if it is wider than a specified number of points (inputted variable; e.g., 3 points for Euro, 6 points for British pound, etc.), then ignore that average bid & ask pair in the calculation.]
- Tier 3 [If no-sales (trades) and no bid and ask-prices occurred during the two-minute interval, then take the five-minute average of sale (trade) prices, weighted by volume where available, from 8:55 to 9:00 a.m. Central time.
- Tier 4 If no sales (trades) occurred during the five-minute interval noted above, take the midpoint of each bid & ask spread where-available and average the resulting midpoints over the five-minute interval. However, when looking at each bid / ask spread, if it is wider than a specified number of points (inputted variable, e.g., 3 points for Euro, 6 points for British pound), then ignore that average bid & ask pair in the calculation.
- Fier-5] If no sales (trades) and no bid and ask prices occurred during the [five-minute] <u>30-second</u> interval, then Exchange staff shall [take into consideration any other information it deems appropriate to determine the CME currency fixing price for that day. This information may be performed in any order by Exchange staff: (1) ropeat the steps described in Tiers 3 or 4 at ever increasing five minute increments (e.g., intervals of 10, 15, 20, etc. minutes) until data is obtained; (2) derive the CME currency fixing price (as a synthetic futures price)[s] from quote vendor spot rates and appropriate maturity forward points[; and (3) set the CME currency fixing price using any other information or method deemed appropriate].

The calculation of the CME currency fixing price at Tiers 1 to [5] 3 shall be rounded to each contract's Price Increment's

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definition. For example, for Euro with a Price Increment of \$0.0001 per Euro, the CME currency fixing price shall be rounded to the nearest \$0.0001 per Euro (with \$0.00005 and above rounded up to \$0.0001, and \$0.00004 and below rounded down to \$0.0000).

An option is in the money if the CME currency fixing price of the underlying futures contract lies above the exercise price in the case of a call, or lies below the exercise price in the case of a put. For example, if the CME currency fixing price were 1.3051 or higher, then 1.3050 Calls shall be exercised. If the CME currency fixing price for Euro were 1.3050 or lower, then 1.3050 calls shall be abandoned. Similarly, if the CME currency fixing price were 1.3049 or lower, then 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised.

(Remainder of rules is unchanged)

Chapter 254A Options on Swiss Franc Futures

Rules 254A00 through 254A03.A.1. are unchanged.

254A03.A.2. Exercise of European-Style Exercise Options

All in-the-money options are automatically exercised by the Clearing House on the day of expiration for the option. All outof-the-money options are abandoned by the Clearing House on the day of expiration for the option. To determine whether an option is in or out of the money on this day, the Exchange shall calculate the relevant "CME currency fixing price" from [pit-traded and]GLOBEX-traded underlying futures contracts as follows:

- Tier 1 Take the [two-minute] <u>30-second</u> average of sale (trade) prices, weighted by volume [where-available,] from [8:58 to 9:00] 8:59:30 to 8:59:59 a.m. Central time on the day of determination of the CME currency fixing price.
- Tier 2 If <u>less than three or</u> no sales (trades) occurred during the [two-minute] <u>30-second</u> interval noted above, take the midpoint of each bid & ask spread where available and average the resulting midpoints over the [two-minute] <u>30-second</u> interval. [However, when looking at each bid / ask spread, if it is wider than a specified number of points (inputted variable, e.g., 3 points for Euro, 6 points for British pound, etc.), then ignore that average bid & ask-pair in the calculation.]
- Tier 3 [If no sales (trades) and no bid and ask-prices occurred during the two-minute interval, then take the five-minute average of sale (trade) prices, weighted by volume where available, from 8:55 to 9:00 a.m. Central time.
- Tier 4 --- If no sales (trades) occurred during the five-minute interval noted above, take the midpoint of each-bid-& ack spread-where-available and average the resulting midpoints over the five minute interval. However, when looking at each bid / ask spread, if it is wider than a specified number of points (inputted variable, e.g., 3 points for Euro, 6 points for British pound), then ignore that average bid & ask-pair in the calculation.
- Tier-5] If no sales (trades) and no bid and ask prices occurred during the [five minute] <u>30-second</u> interval, then Exchange staff shall [take into consideration any other information it deems appropriate to determine the CME currency fixing price for that day.—This information may include, but is not limited to the following, and the procedures to determine the information may be performed in any order by Exchange staff: (1) repeat the stops described in Tiers 3 or 4 at ever-increasing five-minute increments (e.g., intervals of 10, 15, 20, etc. minutes) until data is obtained; (2) derive the CME currency fixing price (as a synthetic futures price)[6] from quote vendor spot rates and appropriate maturity forward points[; and (3) set the CME currency fixing price using any other information or method deemed appropriate].

The calculation of the CME currency fixing price at Tiers 1 to [5] <u>3</u> shall be rounded to each contract's Price Increment's definition. For example, for Euro with a Price Increment of \$0.0001 per Euro, the CME currency fixing price shall be rounded to the nearest \$0.0001 per Euro (with \$0.00005 and above rounded up to \$0.0001, and \$0.00004 and below rounded down to \$0.0000).

An option is in the money if the CME currency fixing price of the underlying futures contract lies above the exercise price in the case of a call, or lies below the exercise price in the case of a put. For example, if the CME currency fixing price were 1.3051 or higher, then 1.3050 Calls shall be exercised. If the CME currency fixing price for Euro were 1.3050 or lower, then 1.3050 calls shall be abandoned. Similarly, if the CME currency fixing price were 1.3049 or lower, then 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be abandoned.

(Remainder of rules is unchanged)

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Chapter 261A Options on Euro Futures

Rules 261A00 through 261A03.A.1. are unchanged.

261A03.A.2. Exercise of European-Style Exercise Options

All in-the-money options are automatically exercised by the Clearing House on the day of expiration for the option. All outof-the-money options are abandoned by the Clearing House on the day of expiration for the option. To determine whether an option is in or out of the money on this day, the Exchange shall calculate the relevant "CME currency fixing price" from [pit-traded and]GLOBEX-traded underlying futures contracts as follows:

- Tier 1 Take the [two-minute] <u>30-second</u> average of sale (trade) prices, weighted by volume [where-available,] from [8:58 to 9:00] 8:59:30 to 8:59:59 a.m. Central time on the day of determination of the CME currency fixing price.
- Tier 2 If less than three or no sales (trades) occurred during the [two-minute] <u>30-second</u> interval noted above, take the midpoint of each bid & ask spread where available and average the resulting midpoints over the [two-minute] <u>30-second</u> interval. [However, when looking at each bid / ask spread, if it is wider than a specified number of points (inputted variable, e.g., 3 points for Euro, 6 points for British pound, etc.), then ignore that average bid & ask pair in the calculation.]
- Tier 3 [If no sales (trades) and no bid and ask prices occurred during the two-minute interval, then take the five-minute average of sale (trade) prices, weighted by volume where available, from 8:55 to 9:00 a.m. Central time.
- Tier 4 If no sales (trades) occurred during the five-minute interval noted above, take-the midpoint of each bid & ask spread where available and average the resulting midpoints over the five-minute interval. However, when looking at each bid / ask spread, if it is wider than a specified number of points (inputted variable, e.g., 3 points for Euro, 6 points for British pound), then ignore that average bid & ask pair in the calculation.
- Tier 5] If no sales (trades) and no bid and ask prices occurred during the [five-minute] <u>30-second</u> interval, then Exchange staff shall [take into-consideration any other information it deems appropriate to determine the CME currency fixing price for that day. This information may include, but is not limited to the following, and the procedures to determine the information may be performed in any order by Exchange staff: (1) repeat the steps described in Tiers 3 or 4 at ever increasing five-minute increments (e.g., intervals of 10, 15, 20, etc. minutes) until data is obtained; (2) derive the CME currency fixing price (as a synthetic futures price)[is] from quote vendor spot rates and appropriate maturity forward points[; and (3) set the CME currency fixing price using any other information or method deemed appropriate).

The calculation of the CME currency fixing price at Tiers 1 to [5] <u>3</u> shall be rounded to each contract's Price Increment's definition. For example, for Euro with a Price Increment of \$0.0001 per Euro, the CME currency fixing price shall be rounded to the nearest \$0.0001 per Euro (with \$0.00005 and above rounded up to \$0.0001, and \$0.00004 and below rounded down to \$0.0000).

An option is in the money if the CME currency fixing price of the underlying futures contract lies above the exercise price in the case of a call, or lies below the exercise price in the case of a put. For example, if the CME currency fixing price were 1.3051 or higher, then 1.3050 Calls shall be exercised. If the CME currency fixing price for Euro were 1.3050 or lower, then 1.3050 calls shall be abandoned. Similarly, if the CME currency fixing price were 1.3049 or lower, then 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised.

(Remainder of rules is unchanged)

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Appendix 3

A Clean Copy of the Approved Rule Amendments to Migrate Current 2:00 PM CME FX Fixing Price / Settlement Price Procedures to the 9:00 AM FX Fixing Price Procedures for Options on Selected FX Futures.

Chapter 251A Options on British Pound Sterling Futures

Rules 251A00 through 251A03.A.1. are unchanged.

251A03.A.2. Exercise of European-Style Exercise Options

All in-the-money options are automatically exercised by the Clearing House on the day of expiration for the option. All out-ofthe-money options are abandoned by the Clearing House on the day of expiration for the option. To determine whether an option is in or out of the money on this day, the Exchange shall calculate the relevant "CME currency fixing price" from GLOBEX-traded underlying futures contracts as follows:

- Tier 1 Take the 30-second average of sale (trade) prices, weighted by volume from 8:59:30 to 8:59:59 a.m. Central time on the day of determination of the CME currency fixing price.
- Tier 2 If less than three or_no sales (trades) occurred during the 30-second interval noted above, take the midpoint of each bid & ask spread where available and average the resulting midpoints over the 30-second_interval.
- Tier 3 If no sales (trades) and no bid and ask prices occurred during the 30-second interval, then Exchange staff shall derive the CME currency fixing price (as a synthetic futures price) from quote vendor spot rates and appropriate maturity forward points.

The calculation of the CME currency fixing price at Tiers 1 to 3 shall be rounded to each contract's Price Increment's definition. For example, for Euro with a Price Increment of \$0.0001 per Euro, the CME currency fixing price shall be rounded to the nearest \$0.0001 per Euro (with \$0.00005 and above rounded up to \$0.0001, and \$0.00004 and below rounded down to \$0.0000).

An option is in the money if the CME currency fixing price of the underlying futures contract lies above the exercise price in the case of a call, or lies below the exercise price in the case of a put. For example, if the CME currency fixing price were 1.3051 or higher, then 1.3050 Calls shall be exercised. If the CME currency fixing price for Euro were 1.3050 or lower, then 1.3050 calls shall be abandoned. Similarly, if the CME currency fixing price were 1.3049 or lower, then 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be abandoned.

(Remainder of rules is unchanged)

Chapter 252A Options on Canadian Dollar Futures

Rules 252A00 through 252A03.A.1. are unchanged.

252A03.A.2. Exercise of European-Style Exercise Options

All in-the-money options are automatically exercised by the Clearing House on the day of expiration for the option. All outof-the-money options are abandoned by the Clearing House on the day of expiration for the option. To determine whether an option is in or out of the money on this day, the Exchange shall calculate the relevant "CME currency fixing price" from GLOBEX-traded underlying futures contracts as follows:

- Tier 1 Take the 30-second average of sale (trade) prices, weighted by volume from 8:59:30 to 8:59:59 a.m. Central time on the day of determination of the CME currency fixing price.
- Tier 2 If less than three or no sales (trades) occurred during the 30-second interval noted above, take the midpoint of each bid & ask spread where available and average the resulting midpoints over the 30-second interval.
- Tier 3 If no sales (trades) and no bid and ask prices occurred during the 30-second interval, then Exchange staff shall derive the CME currency fixing price (as a synthetic futures price) from quote vendor spot rates and appropriate maturity forward points.

The calculation of the CME currency fixing price at Tiers 1 to 3 shall be rounded to each contract's Price Increment's definition. For example, for Euro with a Price Increment of \$0.0001 per Euro, the CME currency fixing price shall be rounded to the nearest \$0.0001 per Euro (with \$0.00005 and above rounded up to \$0.0001, and \$0.00004 and below rounded down to \$0.0000).

An option is in the money if the CME currency fixing price of the underlying futures contract lies above the exercise price in

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the case of a call, or lies below the exercise price in the case of a put. For example, if the CME currency fixing price were 1.3051 or higher, then 1.3050 Calls shall be exercised. If the CME currency fixing price for Euro were 1.3050 or lower, then 1.3050 calls shall be abandoned. Similarly, if the CME currency fixing price were 1.3049 or lower, then 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised.

(Remainder of rules is unchanged)

Chapter 253A Options on Japanese Yen Futures

Rules 253A00 through 253A03.A.1. are unchanged.

253A03.A.2. Exercise of European-Style Exercise Options

All in-the-money options are automatically exercised by the Clearing House on the day of expiration for the option. All outof-the-money options are abandoned by the Clearing House on the day of expiration for the option. To determine whether an option is in or out of the money on this day, the Exchange shall calculate the relevant "CME currency fixing price" from GLOBEX-traded underlying futures contracts as follows:

- Tier 1 Take the 30-second average of sale (trade) prices, weighted by volume from 8:59:30 to 8:59:59 a.m. Central time on the day of determination of the CME currency fixing price.
- Tier 2 If no sales (trades) occurred during the 30-second interval noted above, take the midpoint of each bid & ask spread where available and average the resulting midpoints over the 30-second_interval.
- Tier 3 If no sales (trades) and no bid and ask prices occurred during the 30-second interval, then Exchange staff shall derive the CME currency fixing price (as a synthetic futures price from quote vendor spot rates and appropriate maturity forward points.

The calculation of the CME currency fixing price at Tiers 1 to 3 shall be rounded to each contract's Price Increment's definition. For example, for Euro with a Price Increment of \$0.0001 per Euro, the CME currency fixing price shall be rounded to the nearest \$0.0001 per Euro (with \$0.00005 and above rounded up to \$0.0001, and \$0.00004 and below rounded down to \$0.0000).

An option is in the money if the CME currency fixing price of the underlying futures contract lies above the exercise price in the case of a call, or lies below the exercise price in the case of a put. For example, if the CME currency fixing price were 1.3051 or higher, then 1.3050 Calls shall be exercised. If the CME currency fixing price for Euro were 1.3050 or lower, then 1.3050 calls shall be abandoned. Similarly, if the CME currency fixing price were 1.3049 or lower, then 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be abandoned.

(Remainder of rules is unchanged)

Chapter 254A Options on Swiss Franc Futures

Rules 254A00 through 254A03.A.1. are unchanged.

254A03.A.2. Exercise of European-Style Exercise Options

All in-the-money options are automatically exercised by the Clearing House on the day of expiration for the option. All outof-the-money options are abandoned by the Clearing House on the day of expiration for the option. To determine whether an option is in or out of the money on this day, the Exchange shall calculate the relevant "CME currency fixing price" from GLOBEX-traded underlying futures contracts as follows:

- Tier 1 Take the 30-second average of sale (trade) prices, weighted by volume from 8:59:30 to 8:59:59 a.m. Central time on the day of determination of the CME currency fixing price.
- Tier 2 If no sales (trades) occurred during the 30-second interval noted above, take the midpoint of each bid & ask spread where available and average the resulting midpoints over the 30-second interval.
- Tier 3 If no sales (trades) and no bid and ask prices occurred during the 30-second interval, then Exchange staff shall derive the CME currency fixing price (as a synthetic futures price) from quote vendor spot rates and appropriate maturity forward points.

The calculation of the CME currency fixing price at Tiers 1 to 3 shall be rounded to each contract's Price Increment's definition. For example, for Euro with a Price Increment of \$0.0001 per Euro, the CME currency fixing price shall be

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rounded to the nearest \$0.0001 per Euro (with \$0.00005 and above rounded up to \$0.0001, and \$0.00004 and below rounded down to \$0.0000).

An option is in the money if the CME currency fixing price of the underlying futures contract lies above the exercise price in the case of a call, or lies below the exercise price in the case of a put. For example, if the CME currency fixing price were 1.3051 or higher, then 1.3050 Calls shall be exercised. If the CME currency fixing price for Euro were 1.3049 or lower, then 1.3050 calls shall be abandoned. Similarly, if the CME currency fixing price were 1.3049 or lower, then 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised.

(Remainder of rules is unchanged)

Chapter 261A Options on Euro Futures

Rules 261A00 through 261A03.A.1. are unchanged.

261A03.A.2. Exercise of European-Style Exercise Options

All in-the-money options are automatically exercised by the Clearing House on the day of expiration for the option. All outof-the-money options are abandoned by the Clearing House on the day of expiration for the option. To determine whether an option is in or out of the money on this day, the Exchange shall calculate the relevant "CME currency fixing price" from GLOBEX-traded underlying futures contracts as follows:

- Tier 1 Take the 30-second average of sale (trade) prices, weighted by volume from 8:59:30 to 8:59:59 a.m. Central time on the day of determination of the CME currency fixing price.
- Tier 2 If less than three or_no sales (trades) occurred during the 30-second interval noted above, take the midpoint of each bid & ask spread where available and average the resulting midpoints over the 30-second_interval.
- Tier 3 If no sales (trades) and no bid and ask prices occurred during the 30-second_interval, then Exchange staff shall derive the CME currency fixing price (as a_synthetic futures price) from quote vendor spot rates and appropriate maturity forward points.

The calculation of the CME currency fixing price at Tiers 1 to 3 shall be rounded to each contract's Price Increment's definition. For example, for Euro with a Price Increment of \$0.0001 per Euro, the CME currency fixing price shall be rounded to the nearest \$0.0001 per Euro (with \$0.00005 and above rounded up to \$0.0001, and \$0.00004 and below rounded down to \$0.0000).

An option is in the money if the CME currency fixing price of the underlying futures contract lies above the exercise price in the case of a call, or lies below the exercise price in the case of a put. For example, if the CME currency fixing price were 1.3051 or higher, then 1.3050 Calls shall be exercised. If the CME currency fixing price for Euro were 1.3050 or lower, then 1.3050 calls shall be abandoned. Similarly, if the CME currency fixing price were 1.3049 or lower, then 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised. If the CME currency fixing price were 1.3050 Puts shall be exercised.

(Remainder of rules is unchanged)

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		Tier	18 g	1999	Notes and		23.4	Å er att	West.	Na sele		1244	د. درمد در درمد ریکتر	1. A.	anga salasi Anga salasi	d Shik	an Marija	Tier	2.4.2	ار باری از این از ای از این از این	S dael				و کې دې. د کې کې	لیکنید (مالکید) فارید او در او						<u>1</u> 23
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Sources: Armada Database and CME Group Equity, FX & Alternative Investments Research