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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.<sup>1</sup> 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

<sup>1</sup> Including elimination the "pin risk" by forced exercise of expiring, in-the-money American-style FX options and the 30-second volume-weighted 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).

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 cited 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.

Mr. David Stawick  
November 6, 2008  
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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](mailto: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

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

	EC	JY	BP	GD	SF	AD
<b>Average*</b>	73.50	46.38	43.88	23.25	34.13	14.44
<b>Standard Deviation</b>	73.65	38.53	36.04	24.34	38.64	14.63
<b>High</b>	279	151	139	105	151	49
<b>Low</b>	11	9	4	4	4	1
<b>FX Options Terminations:</b>						
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 2. Summary of Volume for Underlying FX Futures at 30-Second Interval Ending at 9:00 AM**

	EC	JY	BP	GD	SF	AD
<b>Average*</b>	376.31	239.38	166.44	75.63	146.00	39.44
<b>Standard Deviation:</b>	602.78	261.35	185.95	106.06	227.34	38.94
<b>High</b>	2402	875	776	462	976	120
<b>Low</b>	34	23	4	5	5	2
<b>FX Options Terminations:</b>						
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	34	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

## 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)
2. Tier 1: 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).
3. Tier 2: 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 30-second interval, then Tier 3 applies.
4. Tier 3: 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.

## 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-of-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]~~ 30-second 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.~~
- Tier 5] If no sales (trades) and no bid and ask prices occurred during the ~~[five-minute]~~ 30-second 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]~~ 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 for Euro were 1.3050 or higher, then 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 out-of-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]~~ 30-second 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.~~
- ~~Tier 5~~ If no sales (trades) and no bid and ask prices occurred during the ~~[five-minute]~~ 30-second 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]~~ 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 for Euro were 1.3050 or higher, then 1.3050 Puts shall be abandoned.

(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 out-of-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]~~ 30-second 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.~~
- ~~Tier 5~~ If no sales (trades) and no bid and ask prices occurred during the ~~[five-minute]~~ 30-second 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]~~ 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 for Euro were 1.3050 or higher, then 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 out-of-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~~ 30-second 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.~~
- Tier 5] If no sales (trades) and no bid and ask prices occurred during the ~~five-minute~~ 30-second 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 procedure 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)]~~ set the CME currency fixing price (as a synthetic futures price)] 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 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 for Euro were 1.3050 or higher, then 1.3050 Puts shall be abandoned.

(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 out-of-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]~~ 30-second 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.~~
- Tier 5] If no sales (trades) and no bid and ask prices occurred during the ~~[five-minute]~~ 30-second 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]~~ 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 for Euro were 1.3050 or higher, then 1.3050 Puts shall be abandoned.

(Remainder of rules is unchanged)

### 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-of-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 for Euro were 1.3050 or higher, then 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 out-of-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 for Euro were 1.3050 or higher, then 1.3050 Puts shall be abandoned.

(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 out-of-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 for Euro were 1.3050 or higher, then 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 out-of-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 for Euro were 1.3050 or higher, then 1.3050 Puts shall be abandoned.

(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 out-of-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 for Euro were 1.3050 or higher, then 1.3050 Puts shall be abandoned.

(Remainder of rules is unchanged)

**Appendix 4. CME Group FX Futures Fixing Prices at 9:00 AM for Tier 1 and Tier 2 Calculations for 30-Second Interval (Dates are Monthly FX Options Expiration Dates)**

Tier 1				Tier 2																														
B/B/B	Ords	Qty	VWAP	Ask Price	Ords	Qty	Ask Price	Ords	Qty	Ask Price	Ords	Qty	Ask Price	Ords	Qty	Ask Price	Ords	Qty	Ask Price	Ords	Qty	Ask Price	Ords	Qty	Ask Price									
EC	64	216	14304	14300	22	14300	119	25	14301	101	22	14302	53	16	14303	22	7	14304	14305	5	18	14306	13	44	14307	19	75	14308	22	98	14309	22	98	14305
JY	37	137	9385	9385	106	17	9381	101	18	9382	55	14	9383	22	6	9384	9385	6	15	9386	12	40	9387	18	64	9388	18	115	9389	15	118	9385		
BP	71	243	17718	17713	23	5	17714	22	6	17715	14	5	17716	6	2	17717	17718	3	9	17719	6	21	17720	6	31	17721	6	30	17722	6	23	17718		
CD	15	29	9399	9399	4	2	9395	5	2	9396	4	2	9397	4	2	9398	9400	2	5	9401	2	4	9402	2	3	9403	2	3	9404	2	3	9399		
SF	15	80	9021	9018	74	13	9017	69	14	9018	46	12	9019	30	6	9020	9021	6	14	9022	10	42	9023	12	68	9024	11	74	9025	9	65	9021		
AD	49	113	8120	8114	35	7	8115	36	8	8116	31	8	8117	14	4	8118	8120	3	9	8121	8	20	8122	9	31	8123	7	30	8124	6	17	8119		
Tier 1				Tier 2																														
B/B/B	Ords	Qty	VWAP	Ask Price	Ords	Qty	Ask Price	Ords	Qty	Ask Price	Ords	Qty	Ask Price	Ords	Qty	Ask Price	Ords	Qty	Ask Price	Ords	Qty	Ask Price	Ords	Qty	Ask Price									
EC	138	488	14998	14998	48	10	14998	40	8	14997	38	6	14998	27	4	14999	15000	3	11	15001	4	18	15002	7	32	15003	6	26	15004	4	19	15000		
JY	36	97	9109	9104	43	6	9105	50	7	9106	24	4	9107	8	2	9108	9110	2	11	9111	5	44	9112	6	57	9113	5	48	9114	3	28	9109		
BP	51	106	19117	19112	17	2	19113	17	2	19114	9	2	19115	4	2	19116	19118	2	7	19119	2	14	19120	2	14	19122	2	24	19123	1	18	19117		
CD	5	7	9357	9351	41	3	9353	29	2	9354	30	3	9355	20	2	9356	9359	1	10	9360	2	12	9361	2	16	9363	2	21	9364	3	32	9358		
SF	24	59	9255	9251	16	3	9252	20	6	9253	11	4	9254	13	3	9255	9256	3	6	9257	5	26	9258	4	17	9259	3	25	9260	2	18	9256		
AD	1	3	8844	8839	24	2	8839	283	7	8840	13	2	8841	7	3	8842	8846	3	19	8847	2	20	8848	2	12	8849	1	22	8851	2	18	8844		
Tier 1				Tier 2																														
Tier 1				Tier 2																														



		Tier 1										Tier 2																			
S/9/08	Ords	Qty	VWAP	Buy 1	Buy 2	Buy 3	Buy 4	Buy 5	Buy 6	Buy 7	Buy 8	Buy 9	Buy 10	Buy 11	Buy 12	Buy 13	Buy 14	Buy 15	Buy 16	Buy 17	Buy 18	Buy 19	Buy 20								
EC	56	124	15421	110	27	15418	122	27	15419	110	20	15420	49	8	15421	15422	13	42	15423	26	121	15424	32	173	15425	35	199	15426	27	133	15421
JY	25	73	9712	128	24	9709	136	30	9710	94	28	9711	28	12	9712	9713	13	38	9714	30	109	9715	32	156	9716	24	123	9717	17	69	9712
BP	80	254	19419	91	17	19414	77	18	19415	54	14	19416	15	6	19417	19418	8	18	19419	17	48	19420	21	105	19421	16	86	19422	9	46	19418
CD	38	97	9925	48	6	9921	45	10	9922	41	11	9923	16	5	9924	9926	3	6	9927	8	25	9928	11	48	9929	7	39	9930	4	31	9925
SF	83	248	9596	88	21	9591	86	25	9592	68	21	9593	25	11	9594	9596	13	46	9597	22	86	9598	22	91	9599	18	79	9600	14	62	9595
AD	7	13	9373	57	12	9369	62	15	9370	81	20	9371	19	9	9372	9373	5	8	9374	16	30	9375	17	55	9376	14	75	9377	8	50	9373
				279	4	279	163	3	163	100	2	100	19	1	19	0	0	0	1	38	2	38	3	83	3	83	168	4	168	216	

  

		Tier 1										Tier 2																			
4/4/08	Ords	Qty	VWAP	Buy 1	Buy 2	Buy 3	Buy 4	Buy 5	Buy 6	Buy 7	Buy 8	Buy 9	Buy 10	Buy 11	Buy 12	Buy 13	Buy 14	Buy 15	Buy 16	Buy 17	Buy 18	Buy 19	Buy 20								
EC	67	290	15671	92	18	15666	80	16	15667	49	13	15668	15	5	15669	15671	5	17	15672	10	38	15673	13	57	15674	12	61	15675	12	59	15670
JY	59	213	9848	94	16	9845	65	20	9846	62	19	9847	30	10	9848	9849	9	20	9850	19	56	9851	21	82	9852	17	92	9853	12	61	9848
BP	39	144	19855	62	9	19851	61	10	19852	40	8	19853	13	4	19854	19856	3	11	19857	7	38	19858	10	67	19859	10	66	19860	9	46	19855
CD	24	51	9941	14	3	9937	14	4	9938	12	4	9939	7	2	9940	9943	2	10	9944	4	23	9945	4	20	9946	2	13	9947	3	8	9942
SF	12	28	9954	47	9	9949	49	8	9950	29	7	9951	6	3	9952	9954	3	8	9955	7	30	9956	7	42	9957	7	47	9958	6	41	9953
AD	17	56	9108	34	5	9103	38	6	9104	34	8	9105	16	4	9106	9108	4	9	9109	7	20	9110	8	38	9111	7	44	9112	5	31	9107
				122	4	122	66	3	66	59	2	59	16	1	16	1	0	0	2	30	3	30	3	68	4	68	112	5	112	144	





Tier 1				Tier 2																											
11/08	Ords	Qty	VWAP	Day	Order	Price	Qty	Order	Price	Day	Order	Price	Day	Order	Price	Ask 1 Price	Order	Qty	Ask 2 Price	Order	Qty	Ask 3 Price	Order	Qty	Ask 4 Price	Order	Qty	Ask 5 Price	Order	Qty	Price
EC	17	34	14786	15	5	14786	13	8	14787	21	5	14788	7	3	14789	14790	2	5	14792	4	16	14793	5	40	14794	7	35	14795	7	37	14790
JY	13	40	9304	12	5	9300	18	5	9301	7	4	9302	14	6	9303	9304	2	4	9305	3	13	9306	4	40	9307	3	12	9308	3	38	9304
BP	4	4	19714	7	1	19705	3	1	19707	5	1	19710	3	1	19712	19715	1	2	19717	2	8	19718	1	6	19719	1	6	19720	1	6	19713
CD	7	18	10081	14	2	10081	5	1	10082	6	1	10083	4	1	10085	10089	1	13	10090	2	29	10092	2	19	10095	2	12	10096	2	10	10087
SF	4	5	9073	25	4	9069	26	5	9070	19	3	9071	5	2	9072	9074	3	5	9075	6	18	9076	5	21	9077	3	24	9078	2	21	9073
AD	8	22	8738	13	2	8734	13	2	8735	8	2	8736	9	2	8737	8739	2	3	8740	3	6	8741	2	6	8742	2	12	8743	3	19	8738
Tier 1				Tier 2																											
12/7/07	Ords	Qty	VWAP	Day	Order	Price	Qty	Order	Price	Day	Order	Price	Day	Order	Price	Ask 1 Price	Order	Qty	Ask 2 Price	Order	Qty	Ask 3 Price	Order	Qty	Ask 4 Price	Order	Qty	Ask 5 Price	Order	Qty	Price
EC	38	155	14655	15	9	14650	22	9	14651	18	6	14652	15	5	14653	14654	2	13	14657	4	22	14658	6	21	14659	8	19	14660	9	23	14655
JY	9	24	8971	11	2	8964	28	1	8968	25	3	8969	10	2	8970	8972	1	5	8973	2	11	8974	3	24	8976	2	10	8977	2	11	8971
BP	32	173	20280	15	2	20275	24	2	20277	19	2	20278	11	1	20280	20283	2	15	20285	2	7	20286	2	18	20288	2	32	20289	2	30	20281
CD	8	24	9926	11	2	9914	5	2	9916	6	1	9918	9	1	9922	9926	3	7	9928	4	10	9929	4	7	9930	3	6	9932	2	16	9924
SF	12	88	8858	18	3	8854	17	3	8855	17	3	8856	19	2	8857	8859	3	9	8860	3	20	8861	4	41	8862	3	19	8864	2	10	8858
AD	3	6	8807	6	2	8801	4	2	8802	7	1	8804	27	2	8806	8808	2	5	8809	2	5	8810	2	4	8812	1	7	8814	3	3	8807





T/M/07	Tier 1			Tier 2																																													
	Ords	Qty	VWAP	Bid 1	Ask 1	Bid 2	Ask 2	Bid 3	Ask 3	Bid 4	Ask 4	Bid 5	Ask 5	Bid 6	Ask 6	Bid 7	Ask 7	Bid 8	Ask 8	Bid 9	Ask 9	Bid 10	Ask 10	Bid 11	Ask 11	Bid 12	Ask 12	Bid 13	Ask 13	Bid 14	Ask 14	Bid 15	Ask 15	Bid 16	Ask 16	Bid 17	Ask 17	Bid 18	Ask 18	Bid 19	Ask 19	Bid 20	Ask 20						
EC	11	77	13637	13633	13637	13633	13637	13633	13637	13633	13637	13633	13637	13633	13637	13633	13637	13633	13637	13633	13637	13633	13637	13633	13637	13633	13637	13633	13637	13633	13637	13633	13637	13633	13637	13633	13637	13633	13637	13633	13637	13633	13637	13633	13637	13633	13637		
JY	47	412	8180	8175	8180	8175	8180	8175	8180	8175	8180	8175	8180	8175	8180	8175	8180	8175	8180	8175	8180	8175	8180	8175	8180	8175	8180	8175	8180	8175	8180	8175	8180	8175	8180	8175	8180	8175	8180	8175	8180	8175	8180	8175	8180	8175	8180	8175	8180
BP	12	29	20068	20064	20068	20064	20068	20064	20068	20064	20068	20064	20068	20064	20068	20064	20068	20064	20068	20064	20068	20064	20068	20064	20068	20064	20068	20064	20068	20064	20068	20064	20068	20064	20068	20064	20068	20064	20068	20064	20068	20064	20068	20064	20068	20064	20068	20064	20068
CD	12	29	9549	9544	9549	9544	9549	9544	9549	9544	9549	9544	9549	9544	9549	9544	9549	9544	9549	9544	9549	9544	9549	9544	9549	9544	9549	9544	9549	9544	9549	9544	9549	9544	9549	9544	9549	9544	9549	9544	9549	9544	9549	9544	9549	9544	9549		
SF	20	60	8243	8239	8243	8239	8243	8239	8243	8239	8243	8239	8243	8239	8243	8239	8243	8239	8243	8239	8243	8239	8243	8239	8243	8239	8243	8239	8243	8239	8243	8239	8243	8239	8243	8239	8243	8239	8243	8239	8243	8239	8243	8239	8243	8239	8243		
AD	4	25	8560	8558	8560	8558	8560	8558	8560	8558	8560	8558	8560	8558	8560	8558	8560	8558	8560	8558	8560	8558	8560	8558	8560	8558	8560	8558	8560	8558	8560	8558	8560	8558	8560	8558	8560	8558	8560	8558	8560	8558	8560	8558	8560	8558	8560		

  

T/M/07	Tier 1			Tier 2																																											
	Ords	Qty	VWAP	Bid 1	Ask 1	Bid 2	Ask 2	Bid 3	Ask 3	Bid 4	Ask 4	Bid 5	Ask 5	Bid 6	Ask 6	Bid 7	Ask 7	Bid 8	Ask 8	Bid 9	Ask 9	Bid 10	Ask 10	Bid 11	Ask 11	Bid 12	Ask 12	Bid 13	Ask 13	Bid 14	Ask 14	Bid 15	Ask 15	Bid 16	Ask 16	Bid 17	Ask 17	Bid 18	Ask 18	Bid 19	Ask 19	Bid 20	Ask 20				
EC	279	2402	13361	13356	13361	13356	13361	13356	13361	13356	13361	13356	13361	13356	13361	13356	13361	13356	13361	13356	13361	13356	13361	13356	13361	13356	13361	13356	13361	13356	13361	13356	13361	13356	13361	13356	13361	13356	13361	13356	13361	13356	13361	13356	13361	13356	13361
JY	98	875	8226	8222	8226	8222	8226	8222	8226	8222	8226	8222	8226	8222	8226	8222	8226	8222	8226	8222	8226	8222	8226	8222	8226	8222	8226	8222	8226	8222	8226	8222	8226	8222	8226	8222	8226	8222	8226	8222	8226	8222	8226	8222	8226	8222	8226
BP	139	776	19668	19663	19668	19663	19668	19663	19668	19663	19668	19663	19668	19663	19668	19663	19668	19663	19668	19663	19668	19663	19668	19663	19668	19663	19668	19663	19668	19663	19668	19663	19668	19663	19668	19663	19668	19663	19668	19663	19668	19663	19668	19663	19668	19663	19668
CD	22	111	9426	9421	9426	9421	9426	9421	9426	9421	9426	9421	9426	9421	9426	9421	9426	9421	9426	9421	9426	9421	9426	9421	9426	9421	9426	9421	9426	9421	9426	9421	9426	9421	9426	9421	9426	9421	9426	9421	9426	9421	9426	9421	9426	9421	9426
SF	151	976	8102	8098	8102	8098	8102	8098	8102	8098	8102	8098	8102	8098	8102	8098	8102	8098	8102	8098	8102	8098	8102	8098	8102	8098	8102	8098	8102	8098	8102	8098	8102	8098	8102	8098	8102	8098	8102	8098	8102	8098	8102	8098	8102	8098	8102
AD	33	120	8430	8425	8430	8425	8430	8425	8430	8425	8430	8425	8430	8425	8430	8425	8430	8425	8430	8425	8430	8425	8430	8425	8430	8425	8430	8425	8430	8425	8430	8425	8430	8425	8430	8425	8430	8425	8430	8425	8430	8425	8430	8425	8430	8425	8430

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