

December 8, 2014

**BY ELECTRONIC SUBMISSION**

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

**Re: Extension of Regular Trading Hours (Eris Exchange, LLC Submission #2014-06)**

Dear Mr. Kirkpatrick:

Eris Exchange, LLC (“Eris Exchange” or the “Exchange”) hereby submits for self-certification to the Commodity Futures Trading Commission (the “Commission”), under Commission regulation 40.6(a), the following amendments to extend the Eris Exchange Regular Trading Hours. The proposed changes will become effective on December 22, 2014.

**Explanation and Analysis**

The purpose of this rule change is to extend the Regular Trading Hours (“RTH”) for Eris Standard Swap Futures and Eris Flex Swap Futures by one hour and twenty minutes at the beginning of the day.

**Description of Rule Changes**

The Product Specifications in Rule 1101 have been modified to reflect the new opening time. Rule 601 remains unchanged. This rule contains a 15-minute block trade reporting requirement for RTH, and the requirement that block trades in Eris Flexes during RTH must be reported to the Exchange within 15 minutes of the transaction, or by 4:35 pm ET (whichever comes first).

The Exchange has attached a copy of the Exchange Advisory (“Advisory”) and the text of the amended Rules, including all additions and deletions, hereto as Exhibit 1.

**Core Principle Compliance**

The Exchange will continue to comply with Core Principle 2 (Compliance with Rules) and Core Principle 3 (Contracts Not Readily Subject to Manipulation) because the Amendments will not impact the Exchange’s ability to perform its trade practice and market surveillance obligations under the Act. Additionally, the Exchange’s market regulation staff will continue to monitor all market participants that trade the Exchange’s products to prevent manipulative trading and market abuse, during all hours.

Furthermore, the Amendments comply with Core Principle 9 (Execution of Transactions) by continuing to provide a competitive, open, and efficient market.

## Public Information

A notice and copy of this submission has been concurrently posted on the Exchange's website at <http://erisfutures.com/cftc-submissions>.

## Opposing Views

This submission was provided to the Exchange Practices Committee and the Regulatory Oversight Committee, and there were no opposing views expressed that were not incorporated into the rule changes.

## Certification

Eris Exchange, LLC hereby certifies to the Commodity Futures Trading Commission, pursuant to the procedures set forth in the Commission regulation §40.6, that this submission complies with the Commodity Exchange Act, as amended, and the regulations promulgated thereunder.

In the event that you have questions, please contact me at the information below.

Sincerely,



Laurian Cristea  
Chief Regulatory Officer, and  
Head of Legal and Regulatory Affairs  
[laurian.cristea@erisfutures.com](mailto:laurian.cristea@erisfutures.com)  
T 646.961.4487

## Exchange Advisory

TO: Eris Exchange Market Participants

FROM: Eris Exchange Control Center and Market Regulation Department

ADVISORY: #14-06

DATE: December 8, 2014

SUBJECT: Extension of Regular Trading Hours

### Background

This Exchange Advisory serves to notify Participants of Eris Exchange, LLC (“Eris Exchange” or “Exchange”) that:

- I. The Exchange is extending Regular Trading Hours (“RTH”) for Eris Standards and Eris Flexes by one hour and twenty minutes, opening at 7:00 am ET as of the effective date.
- II. The Exchange has filed a self-certification with the Commodity Futures Trading Commission to amend Exchange Rule 1101.
- III. **Subject to regulatory review, these changes will be effective on December 22, 2014.**

The reporting time requirements for block trades and EDRP’s are reflected below, pursuant to Rules 601 and 602 which remain unchanged. The amended Rule 1101 is attached in redline and final form as Attachment A and B respectively.

### New Trading Hours Summary

Products	RTH <sup>1</sup>	OTH	RTH Block Trade and EDRP Reporting	OTH Block Trade and EDRP Reporting	Submission for Clearing
<b>Eris Standards</b>	7:00am to 5:00pm	All other times	Within 15 minutes	6:45am – 6:55am or within 15 minutes of execution time, whichever is later	By 5:15pm (same Trade Date)
<b>Eris Flexes</b>	7:00am to 4:30pm	All other times, except for 4:30pm to 5:00pm on Business Days	Within 15 minutes or by 4:35pm, whichever is earlier	6:45am – 6:55am or within 15 minutes of execution time, whichever is later	By 4:35pm (same Trade Date)

<sup>1</sup> Pertains to all valid Business Days, all times in table are ET.

**ATTACHMENT A**
**RULE 1101. Eris Interest Rate Swap Futures Contract Specifications**

(a) Flex Contract Specifications:

<b>Trading Hours</b>	Regular Trading Hours (RTH): <ul style="list-style-type: none"> <li>Monday – Friday; <b>8:20:00</b> am to 4:30 pm Eastern Time</li> </ul>
<b>Daily Settlement Price (Futures-Style Price)</b>	<p>Eris Interest Rate Swap Futures are priced on a basis of 100, similar to market practice for bonds and other futures contracts.</p> <p>The settlement value for each Contract is defined as:</p> $S_t = 100 + A_t + B_t - C_t$ <p> <math>S_t</math> = settlement price at time t  <math>A_t</math> = net present value of the future cash flows at time t, based on OIS discounting  <math>B_t</math> = value of the historical fixed and floating amounts since contract inception  <math>C_t</math> = Eris Price Alignment Interest (or Eris PAI™).         </p> <p>Eris Exchange and CME Clearing calculate Daily Settlement Price to 4 decimals of precision (e.g., 100.1234).</p> <p>Eris PAI™ is a cumulative value calculated daily by applying the overnight Fed Funds effective rate to the contract's NPV, using an Actual/360 day-count convention. Eris PAI™ will start accruing on the first trade date.</p> <p><b>Eris Exchange calculates daily Eris PAI™ for all trades executed between 8:20am and 4:30pm ET during RTH using the overnight fed funds effective rate that was published on the morning of the trade date. For all other trades, daily Eris PAI™ is calculated using the overnight fed funds rate that was published on the morning of the previous trade date.</b></p> <p><del>Eris Exchange calculates daily Eris PAI™ for all OTH trades using the overnight Fed Funds effective rate that was published on the Business Day of the previous RTH.</del></p>

(b) Standard Contract Specifications

(1) 2 Year Standard Contract Specifications:

<b>Trading Hours</b>	Regular Trading Hours (RTH): Monday – Friday; <del>8:20</del> 7:00 am to 5:00 pm Eastern Time
<b>Daily Settlement Price (Futures-Style Price)</b>	<p>Eris Interest Rate Swap Futures are priced on a basis of 100, similar to market practice for bonds and other futures contracts.</p> <p>The settlement value for each Contract is defined as:</p> $S_t = 100 + A_t + B_t - C_t$ <p> <math>S_t</math> = settlement price at time t  <math>A_t</math> = net present value of the future cash flows at time t, based on OIS discounting  <math>B_t</math> = value of the historical fixed and floating amounts since contract inception  <math>C_t</math> = Eris Price Alignment Interest (or Eris PAI™).         </p> <p>Eris Exchange and CME Clearing calculate Daily Settlement Price to 4 decimals of precision (e.g., 100.1234).</p> <p>Eris PAI™ is a cumulative value calculated daily by applying the overnight Fed Funds effective rate to the contract's NPV, using an Actual/360 day-count convention. Eris PAI™ will start accruing on the first listing date.</p> <p><del>Eris Exchange calculates daily Eris PAI™ for all OTH trades using the overnight Fed Funds effective rate that was published on the Business Day of the previous RTH.</del></p> <p><del>Eris Exchange calculates daily Eris PAI™ for all OTH trades using the overnight Fed Funds effective rate that was published on the Business Day of the previous RTH.</del></p>

(2) 5 Year Standard Contract Specifications:

<b>Trading Hours</b>	Regular Trading Hours (RTH): Monday – Friday; <del>8:20</del> 7:00 am to 5:00 pm Eastern Time
<b>Daily Settlement Price (Futures-Style Price)</b>	<p>Eris Interest Rate Swap Futures are priced on a basis of 100, similar to market practice for bonds and other futures contracts.</p> <p>The settlement value for each Contract is defined as:</p> $S_t = 100 + A_t + B_t - C_t$ <p> <math>S_t</math> = settlement price at time t  <math>A_t</math> = net present value of the future cash flows at time t, based on OIS discounting  <math>B_t</math> = value of the historical fixed and floating amounts since contract inception  <math>C_t</math> = Eris Price Alignment Interest (or Eris PAI™).         </p> <p>Eris Exchange and CME Clearing calculate Daily Settlement Price to 4 decimals of precision (e.g., 100.1234).</p> <p>Eris PAI™ is a cumulative value calculated daily by applying the overnight Fed Funds effective rate to the contract's NPV, using an Actual/360 day-count convention. Eris PAI™ will start accruing on the first listing date.</p> <p><b>Eris Exchange calculates daily Eris PAI™ for all trades executed between 8:20am and 5:00pm ET during RTH using the overnight fed funds effective rate that was published on the morning of the trade date. For all other trades, daily Eris PAI™ is calculated using the overnight fed funds rate that was published on the morning of the previous trade date.</b></p> <p><del>Eris Exchange calculates daily Eris PAI™ for all OTH trades using the overnight Fed Funds effective rate that was published on the Business Day of the previous RTH.</del></p>

(3) 7 Year Standard Contract Specifications:

<b>Trading Hours</b>	Regular Trading Hours (RTH): Monday – Friday; <del>8:20</del> 7:00 am to 5:00 pm Eastern Time
<b>Daily Settlement Price (Futures-Style Price)</b>	<p>Eris Interest Rate Swap Futures are priced on a basis of 100, similar to market practice for bonds and other futures contracts.</p> <p>The settlement value for each Contract is defined as:</p> $S_t = 100 + A_t + B_t - C_t$ <p> <math>S_t</math> = settlement price at time t  <math>A_t</math> = net present value of the future cash flows at time t, based on OIS discounting  <math>B_t</math> = value of the historical fixed and floating amounts since contract inception  <math>C_t</math> = Eris Price Alignment Interest (or Eris PAI™).         </p> <p>Eris Exchange and CME Clearing calculate Daily Settlement Price to 4 decimals of precision (e.g., 100.1234).</p> <p>Eris PAI™ is a cumulative value calculated daily by applying the overnight Fed Funds effective rate to the contract's NPV, using an Actual/360 day-count convention. Eris PAI™ will start accruing on the first listing date.</p> <p><b>Eris Exchange calculates daily Eris PAI™ for all trades executed between 8:20am and 5:00pm ET during RTH using the overnight fed funds effective rate that was published on the morning of the trade date. For all other trades, daily Eris PAI™ is calculated using the overnight fed funds rate that was published on the morning of the previous trade date.</b></p> <p><del>Eris Exchange calculates daily Eris PAI™ for all OTH trades using the overnight Fed Funds effective rate that was published on the Business Day of the previous RTH.</del></p>

(4) 10 Year Standard Contract Specifications:

<b>Trading Hours</b>	Regular Trading Hours (RTH): Monday – Friday; <del>8:20</del> 7:00 am to 5:00 pm Eastern Time
<b>Daily Settlement Price (Futures-Style Price)</b>	<p>Eris Interest Rate Swap Futures are priced on a basis of 100, similar to market practice for bonds and other futures contracts.</p> <p>The settlement value for each Contract is defined as:</p> $S_t = 100 + A_t + B_t - C_t$ <p> <math>S_t</math> = settlement price at time t  <math>A_t</math> = net present value of the future cash flows at time t, based on OIS discounting  <math>B_t</math> = value of the historical fixed and floating amounts since contract inception  <math>C_t</math> = Eris Price Alignment Interest (or Eris PAI™).         </p> <p>Eris Exchange and CME Clearing calculate Daily Settlement Price to 4 decimals of precision (e.g., 100.1234).</p> <p>Eris PAI™ is a cumulative value calculated daily by applying the overnight Fed Funds effective rate to the contract’s NPV, using an Actual/360 day-count convention. Eris PAI™ will start accruing on the first listing date.</p> <p><b>Eris Exchange calculates daily Eris PAI™ for all trades executed between 8:20am and 5:00pm ET during RTH using the overnight fed funds effective rate that was published on the morning of the trade date. For all other trades, daily Eris PAI™ is calculated using the overnight fed funds rate that was published on the morning of the previous trade date.</b></p> <p><del>Eris Exchange calculates daily Eris PAI™ for all OTH trades using the overnight Fed Funds effective rate that was published on the Business Day of the previous RTH.</del></p>

(5) 30 Year Standard Contract Specifications:

<b>Trading Hours</b>	Regular Trading Hours (RTH): Monday – Friday; <del>8:20</del> 7:00 am to 5:00 pm Eastern Time
<b>Daily Settlement Price (Futures-Style Price)</b>	<p>Eris Interest Rate Swap Futures are priced on a basis of 100, similar to market practice for bonds and other futures contracts.</p> <p>The settlement value for each Contract is defined as:</p> $S_t = 100 + A_t + B_t - C_t$ <p> <math>S_t</math> = settlement price at time t  <math>A_t</math> = net present value of the future cash flows at time t, based on OIS discounting  <math>B_t</math> = value of the historical fixed and floating amounts since contract inception  <math>C_t</math> = Eris Price Alignment Interest (or Eris PAI™).         </p> <p>Eris Exchange and CME Clearing calculate Daily Settlement Price to 4 decimals of precision (e.g., 100.1234).</p> <p>Eris PAI™ is a cumulative value calculated daily by applying the overnight Fed Funds effective rate to the contract’s NPV, using an Actual/360 day-count convention. Eris PAI™ will start accruing on the first listing date.</p> <p><b>Eris Exchange calculates daily Eris PAI™ for all trades executed between 8:20am and 5:00pm ET during RTH using the overnight fed funds effective rate that was published on the morning of the trade date. For all other trades, daily Eris PAI™ is calculated using the overnight fed funds rate that was published on the morning of the previous trade date.</b></p> <p><del>Eris Exchange calculates daily Eris PAI™ for all OTH trades using the overnight Fed Funds effective rate that was published on the Business Day of the previous RTH.</del></p>

**ATTACHMENT B**
**RULE 1101. Eris Interest Rate Swap Futures Contract Specifications**

(a) Flex Contract Specifications:

<b>Trading Hours</b>	Regular Trading Hours (RTH): <ul style="list-style-type: none"> <li>Monday – Friday; 7:00 am to 4:30 pm Eastern Time</li> </ul>
<b>Daily Settlement Price (Futures-Style Price)</b>	<p>Eris Interest Rate Swap Futures are priced on a basis of 100, similar to market practice for bonds and other futures contracts.</p> <p>The settlement value for each Contract is defined as:</p> $S_t = 100 + A_t + B_t - C_t$ <p> <math>S_t</math> = settlement price at time t  <math>A_t</math> = net present value of the future cash flows at time t, based on OIS discounting  <math>B_t</math> = value of the historical fixed and floating amounts since contract inception  <math>C_t</math> = Eris Price Alignment Interest (or Eris PAI™).         </p> <p>Eris Exchange and CME Clearing calculate Daily Settlement Price to 4 decimals of precision (e.g., 100.1234).</p> <p>Eris PAI™ is a cumulative value calculated daily by applying the overnight Fed Funds effective rate to the contract's NPV, using an Actual/360 day-count convention. Eris PAI™ will start accruing on the first trade date.</p> <p>Eris Exchange calculates daily Eris PAI™ for all trades executed between 8:20am and 4:30pm ET during RTH using the overnight fed funds effective rate that was published on the morning of the trade date. For all other trades, daily Eris PAI™ is calculated using the overnight fed funds rate that was published on the morning of the previous trade date.</p>

(b) Standard Contract Specifications

(1) 2 Year Standard Contract Specifications:

<b>Trading Hours</b>	Regular Trading Hours (RTH): Monday – Friday; 7:00 am to 5:00 pm Eastern Time
<b>Daily Settlement Price (Futures-Style Price)</b>	<p>Eris Interest Rate Swap Futures are priced on a basis of 100, similar to market practice for bonds and other futures contracts.</p> <p>The settlement value for each Contract is defined as:</p> $S_t = 100 + A_t + B_t - C_t$ <p> <math>S_t</math> = settlement price at time t  <math>A_t</math> = net present value of the future cash flows at time t, based on OIS discounting  <math>B_t</math> = value of the historical fixed and floating amounts since contract inception  <math>C_t</math> = Eris Price Alignment Interest (or Eris PAI™).         </p> <p>Eris Exchange and CME Clearing calculate Daily Settlement Price to 4 decimals of precision (e.g., 100.1234).</p> <p>Eris PAI™ is a cumulative value calculated daily by applying the overnight Fed Funds effective rate to the contract's NPV, using an Actual/360 day-count convention. Eris PAI™ will start accruing on the first listing date.</p> <p>Eris Exchange calculates daily Eris PAI™ for all trades executed between 8:20am and 5:00pm ET during RTH using the overnight fed funds effective rate that was published on the morning of the trade date. For all other trades, daily Eris PAI™ is calculated using the overnight fed funds rate that was published on the morning of the previous trade date.</p>

(2) 5 Year Standard Contract Specifications:

<b>Trading Hours</b>	Regular Trading Hours (RTH): Monday – Friday; 7:00 am to 5:00 pm Eastern Time
<b>Daily Settlement Price (Futures-Style Price)</b>	<p>Eris Interest Rate Swap Futures are priced on a basis of 100, similar to market practice for bonds and other futures contracts.</p> <p>The settlement value for each Contract is defined as:</p> $S_t = 100 + A_t + B_t - C_t$ <p> <math>S_t</math> = settlement price at time t  <math>A_t</math> = net present value of the future cash flows at time t, based on OIS discounting  <math>B_t</math> = value of the historical fixed and floating amounts since contract inception  <math>C_t</math> = Eris Price Alignment Interest (or Eris PAI™).         </p> <p>Eris Exchange and CME Clearing calculate Daily Settlement Price to 4 decimals of precision (e.g., 100.1234).</p> <p>Eris PAI™ is a cumulative value calculated daily by applying the overnight Fed Funds effective rate to the contract's NPV, using an Actual/360 day-count convention. Eris PAI™ will start accruing on the first listing date.</p> <p>Eris Exchange calculates daily Eris PAI™ for all trades executed between 8:20am and 5:00pm ET during RTH using the overnight fed funds effective rate that was published on the morning of the trade date. For all other trades, daily Eris PAI™ is calculated using the overnight fed funds rate that was published on the morning of the previous trade date.</p>

(3) 7 Year Standard Contract Specifications:

<b>Trading Hours</b>	Regular Trading Hours (RTH): Monday – Friday; 7:00 am to 5:00 pm Eastern Time
<b>Daily Settlement Price (Futures-Style Price)</b>	<p>Eris Interest Rate Swap Futures are priced on a basis of 100, similar to market practice for bonds and other futures contracts.</p> <p>The settlement value for each Contract is defined as:</p> $S_t = 100 + A_t + B_t - C_t$ <p> <math>S_t</math> = settlement price at time t  <math>A_t</math> = net present value of the future cash flows at time t, based on OIS discounting  <math>B_t</math> = value of the historical fixed and floating amounts since contract inception  <math>C_t</math> = Eris Price Alignment Interest (or Eris PAI™).         </p> <p>Eris Exchange and CME Clearing calculate Daily Settlement Price to 4 decimals of precision (e.g., 100.1234).</p> <p>Eris PAI™ is a cumulative value calculated daily by applying the overnight Fed Funds effective rate to the contract's NPV, using an Actual/360 day-count convention. Eris PAI™ will start accruing on the first listing date.</p> <p>Eris Exchange calculates daily Eris PAI™ for all trades executed between 8:20am and 5:00pm ET during RTH using the overnight fed funds effective rate that was published on the morning of the trade date. For all other trades, daily Eris PAI™ is calculated using the overnight fed funds rate that was published on the morning of the previous trade date.</p>

(4) 10 Year Standard Contract Specifications:

<b>Trading Hours</b>	Regular Trading Hours (RTH): Monday – Friday; 7:00 am to 5:00 pm Eastern Time
<b>Daily Settlement Price (Futures-Style Price)</b>	<p>Eris Interest Rate Swap Futures are priced on a basis of 100, similar to market practice for bonds and other futures contracts.</p> <p>The settlement value for each Contract is defined as:</p> $S_t = 100 + A_t + B_t - C_t$ <p> <math>S_t</math> = settlement price at time t  <math>A_t</math> = net present value of the future cash flows at time t, based on OIS discounting  <math>B_t</math> = value of the historical fixed and floating amounts since contract inception  <math>C_t</math> = Eris Price Alignment Interest (or Eris PAI™).         </p> <p>Eris Exchange and CME Clearing calculate Daily Settlement Price to 4 decimals of precision (e.g., 100.1234).</p> <p>Eris PAI™ is a cumulative value calculated daily by applying the overnight Fed Funds effective rate to the contract's NPV, using an Actual/360 day-count convention. Eris PAI™ will start accruing on the first listing date.</p> <p>Eris Exchange calculates daily Eris PAI™ for all trades executed between 8:20am and 5:00pm ET during RTH using the overnight fed funds effective rate that was published on the morning of the trade date. For all other trades, daily Eris PAI™ is calculated using the overnight fed funds rate that was published on the morning of the previous trade date.</p>

(5) 30 Year Standard Contract Specifications:

<b>Trading Hours</b>	Regular Trading Hours (RTH): Monday – Friday; 7:00 am to 5:00 pm Eastern Time
<b>Daily Settlement Price (Futures-Style Price)</b>	<p>Eris Interest Rate Swap Futures are priced on a basis of 100, similar to market practice for bonds and other futures contracts.</p> <p>The settlement value for each Contract is defined as:</p> $S_t = 100 + A_t + B_t - C_t$ <p> <math>S_t</math> = settlement price at time t  <math>A_t</math> = net present value of the future cash flows at time t, based on OIS discounting  <math>B_t</math> = value of the historical fixed and floating amounts since contract inception  <math>C_t</math> = Eris Price Alignment Interest (or Eris PAI™).         </p> <p>Eris Exchange and CME Clearing calculate Daily Settlement Price to 4 decimals of precision (e.g., 100.1234).</p> <p>Eris PAI™ is a cumulative value calculated daily by applying the overnight Fed Funds effective rate to the contract’s NPV, using an Actual/360 day-count convention. Eris PAI™ will start accruing on the first listing date.</p> <p>Eris Exchange calculates daily Eris PAI™ for all trades executed between 8:20am and 5:00pm ET during RTH using the overnight fed funds effective rate that was published on the morning of the trade date. For all other trades, daily Eris PAI™ is calculated using the overnight fed funds rate that was published on the morning of the previous trade date.</p>

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