
TO: Eris Exchange Market Participants

FROM: Market Regulation Department

ADVISORY: #15-M10

DATE: August 10, 2015

SUBJECT: Form 102A and 102B Submissions for Ownership and Control Reporting

This Market Notice supersedes Market Notice #15-M02 and serves to notify Participants of Eris Exchange, LLC ("Eris Exchange" or "Exchange") that the Exchange is amending Rule 532 (attached as Exhibit A) and Rule 533 (attached as Exhibit B), subject to regulatory review, to require Ownership and Control Reporting ("OCR") Form 102A and Form 102B submissions to the Exchange.

Effective October 1, 2015, Clearing Firms must submit a Form 102A or Form 102B, as applicable, to fulfill its obligations under amended Rule 532. Between October 1, 2015 and December 31, 2015 a Clearing Firm may submit a Form 102 in lieu of a Form 102A.

Amended Rule 532 requires the submission of an applicable Form 102A and/or 102B for each reportable account. A reportable account is any position at or above the reportable level in a discrete Commodity Code, as set forth in amended Rule 533.

In an effort to reduce additional development costs and provide clarity to implement the requirement for Reporting Firms, Eris Exchange will be collecting this OCR information in the same format as required by the CFTC OCR rules, via the revised Form 102A and Form 102B. All CFTC requirements, including the CFTC OCR file specifications and format can be found here: <http://www.cftc.gov/Forms/OCR>.

Form 102

There is no change to the current submission process for Form 102 and Clearing Firms may continue to submit Form 102, in lieu of Form 102A, to fulfill its obligations under amended Rule 532, via electronic mail until December 31, 2015.

Form 102A and Form 102B

The following requirements apply to Clearing Firms on days required to submit a Form 102A and/or Form 102B:

- Clearing Firms submit a single file per day containing records for all accounts applicable to Eris Exchange, following CFTC format specifications (<http://www.cftc.gov/Forms/OCR>) and naming convention:
 - OCRFORM_102_[IDENTIFIER]_[YYYYMMDD]_[SOURCE].xml.
- Clearing Firms submit Form 102A and Form 102B information to the Eris Exchange sFTP folder or through the FIA Tech OCR system.
- Clearing Firms that do not have an sFTP folder can request setup from ErisControlCenter@erisfutures.com.

Form 102A and Form 102B Testing

- Clearing Firms may test the Form 102A and Form 102B submission process beginning August 10, 2015 by first contacting the Eris Control Center to coordinate testing times and credentials.
 - The Exchange supports the use of the FIA Tech OCR system for testing.
- Clearing Firms will utilize the following naming convention and submit test files via sFTP to the same folder used by each firm for daily LTR file:
 - OCRFORM_102_[IDENTIFIER]_[YYYYMMDD]_[SOURCE]_TEST.xml.

More Information

Eris Exchange recognizes that in some instances there are differences between the Exchange reportable levels and the CFTC's reporting levels. For products where the Exchange reportable levels are higher than the CFTC levels, the Exchange will accept over-reporting of accounts and will not reject files on the basis that the position reported is below the Exchange's reportable level. The Exchange does not currently have products where the Exchange large trader reportable levels are lower than the CFTC levels.

For more information, please contact the Eris Control Center at ErisControlCenter@erisfutures.com.

You are receiving this email as you are subscribed to Notices@erisfutures.com. If you would like to unsubscribe or if you know of someone that should be on this distribution please contact the ErisControlCenter@erisfutures.com.

EXHIBIT A**(Amended Rule effective October 1, 2015, subject to regulatory review)****RULE 532. Reports of Large Positions and Ownership and Control Reporting****(a) Large Trader Reporting**

- (1) Clearing Firms shall submit to the Exchange a daily report of all positions at or above the Reportable Futures Level as set forth in the Table in Rule 533 ("Large Trader Report").
- (2) Positions at or above the Reportable Futures Level in a discrete Commodity Code trigger reportable status. For a person in reportable status in a discrete Commodity Code, all positions, regardless of size, in the same discrete Commodity Code must be reported.

For the avoidance of doubt, if the discrete Commodity Code that triggers the reportable status is a Contract with a A9102 Commodity Code, then all other positions in Contracts with a A9102 Commodity Code would be required to be reported under this Rule 532(b). Any other discrete Commodity Codes (i.e., A0004, A0006, other *Annnn* Commodity Codes, *Bnnnn* Commodity Codes, *Cnnnn* Commodity Codes, or *Dnnnn* Commodity Codes) would not be required to be reported (provided that such A0004, A0006, other *Annnn* Commodity Codes, *Bnnnn*, Commodity Codes, *Cnnnn* Commodity Codes, or *Dnnnn* Commodity Codes have not independently triggered reportable status).

- (3) All Large Trader Reports shall be submitted in a form acceptable to the Market Regulation Department. The Exchange may require that more than one Large Trader Report be submitted daily. The Regulatory Oversight Committee or the Market Regulation Department may require reports from any Clearing Firm on a lesser number of positions than reflected in the Table in Rule 533.

(b) Ownership and Control Reporting

- (1) Clearing Firms must provide the Market Regulation Department with the required CFTC Form 102A and/or Form 102B identifying the owner, any controlling parties and any additional required information for each reportable account. A reportable account for the purposes of this Rule 532(b)(1) is an account at or above the Reportable Futures Level and/or the Volume Threshold Reportable Level as identified in the table in Rule 533.
- (2) The applicable Form 102A and/or Form 102B must be submitted to the Market Regulation Department no later than 9:00 am Eastern Time on the Business Day following the date on which the account becomes reportable. Additionally, Clearing Firms must submit a revised form reflecting any material changes to the information previously provided to the Market Regulation Department within three Business Days of such changes becoming effective. In the absence of any material changes, the Exchange may require electronic submission of a new Form 102A and/or Form 102B on an annual basis for the maintenance of accurate records.

EXHIBIT B

(Amended Rule effective October 1, 2015 subject to regulatory review)

RULE 533. Position Limit, Position Accountability, Reportable Level and Volume Threshold Level Table

- (a) The reportable levels for all Contracts are set forth in the Position Limit, Position Accountability, Reportable Level and Volume Threshold Level Table below. For purposes of the Large Trader Report, Contracts shall be reported according to discrete Commodity Code. The Commodity Code shall be the Contract's Clearing Code, as defined in Rule 1101, absent the Z at the beginning of the code. The Commodity Code is an alpha-numeric code that consists of two components. The first component is the letter at the beginning of the code, which represents the tenor of the contract. The second component of the Commodity Code is the 4 numbers that follow the letter (i.e., "nnnn" in the Table below). These 4 numbers represent each unique contract, meaning a contract with a different coupon and/or a different first trade date, for any given maturity date. For example, a Contract with a Clearing Code of ZA0004 shall have a Commodity Code of A0004 and a Contract with a Clearing Code of ZA0006 shall have a Commodity Code of A0006. For purposes of the large trader report, all Contracts in the respective Commodity Code (i.e., A0004 or A0006) shall be grouped in order to determine reportable futures level and position accountability. The reportable level is the net long position or the net short position for each discrete Commodity Code. Pursuant to Rule 909, concurrent long and short positions must be reported to the Exchange for both sides as open positions (i.e., net long positions or net short positions).
- (b) A Volume Threshold Reportable Account (as identified in the table below) is any account that meets the volume threshold of contracts traded in a single trading day as defined in CFTC Regulation 15.04. A Clearing Firm shall submit an applicable CFTC Form 102B in accordance with Rule 532(d) for each account that becomes a Volume Threshold Reportable Account.

Position Limit, Position Accountability, Reportable Level and Volume Threshold Level Table:

| Contract Name | Commodity Code | Tenor of each discrete Commodity Code | Reportable Futures Level for each discrete Commodity Code (Large Trader Report and Form 102A) | Position Accountability for each discrete Commodity Code | Position Limit for each discrete Commodity Code | Volume Threshold Reportable Level for each discrete Commodity Code (Form 102B) |
|-------------------------------------|----------------|---|---|--|---|--|
| Interest Rate Swap Futures Contract | <i>Annnn</i> | Less than or equal to 2 years | 3000 | 6000 | N/A | 50 |
| Interest Rate Swap Futures Contract | <i>Bnnnn</i> | Greater than 2 years and less than or equal to 5 years | 3000 | 6000 | N/A | 50 |
| Interest Rate Swap Futures Contract | <i>Cnnnn</i> | Greater than 5 years and less than or equal to 10 years | 3000 | 6000 | N/A | 50 |
| Interest Rate Swap Futures Contract | <i>Dnnnn</i> | Greater than 10 years | 3000 | 6000 | N/A | 50 |