February 13, 2025

BY ELECTRONIC FILING

Mr. Christopher J. Kirkpatrick
Office of the Secretariat
Commodity Futures Trading Commission
Washington, D.C. 20581

Re: BTNL Self-Certification Pursuant to CFTC Regulation 40.2(a) Certification - Listing of Bitcoin Cash US Dollar Hecto Futures Contract

Dear Mr. Kirkpatrick,

Bitnomial Exchange, LLC ("BTNL" or the "Exchange"), a designated contract market ("DCM"), hereby notifies the Commodity Futures Trading Commission ("CFTC" or the "Commission") that it hereby submits for self-certification its initial listing of the Bitcoin Cash US Dollar Hecto Futures ("BCUH") contracts to be offered for trading on BTNL for an intended trade date on or after February 18, 2025.

Contract Description

The BCUH contract is a physically-settled, margined futures contract based on the price of 100 BCH (Bitcoin Cash). Attached Exchange Rule "Bitcoin Cash US Dollar Hecto Futures Contract" details the product specifications.

Bitcoin Cash (BCH) Market Overview

Bitcoin Cash is a decentralized cryptocurrency that was created to enhance Bitcoin's transaction speed and affordability. It features larger block sizes, allowing for greater throughput and lower fees. Bitcoin Cash is widely used as a digital cash system, supporting peer-to-peer payments and merchant adoption. The BCH community emphasizes usability, fast settlement times, and accessibility, making it a practical option for day-to-day transactions.

Price History

Source: https://www.coingecko.com

Volume History

Source: https://www.coingecko.com

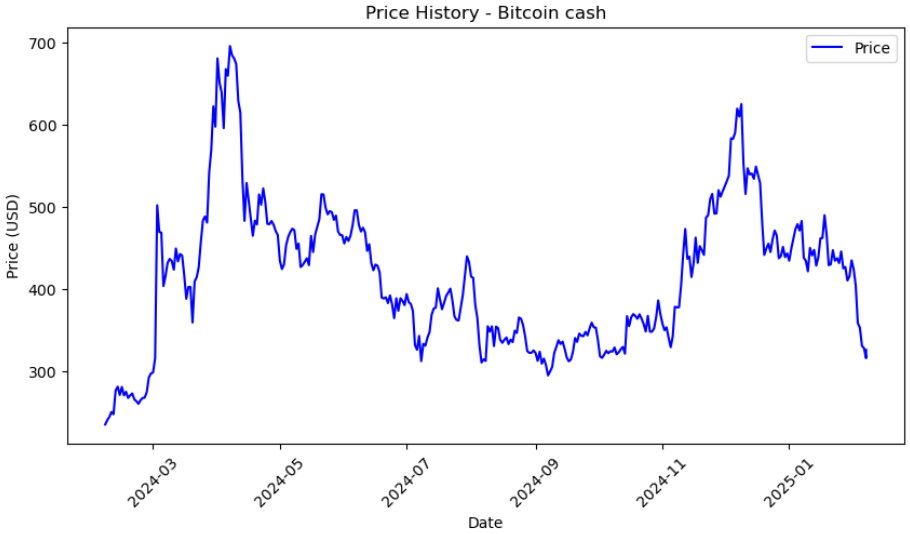

Figure 1: Price Chart

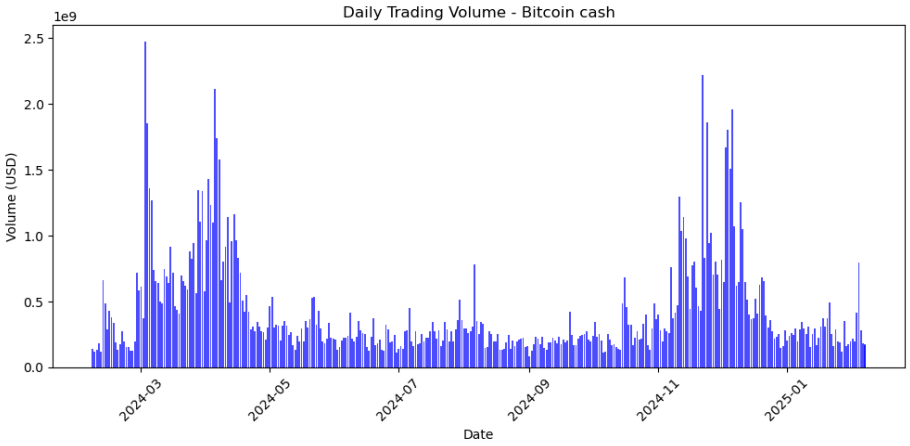

Figure 2: Volume Chart

Deliverable Supply Analysis

- **Current Circulation**: 19,826,062 BCH
- **Total Supply**: 19,826,087 BCH
- **Max Supply**: 21,000,000 BCH
- **Market Cap**: $6,424,928,313.00

The Exchange proposes a contract month position limit of 200 futures contracts, representing 0.1% of total deliverable supply.

Core Principle Compliance

BTNL has determined that its rules related to the listing of BCUH contracts comply with the requirements of the Commodity Exchange Act and the rules and regulations promulgated by the Commission thereunder. BTNL has reviewed the DCM Core Principles and related guidance and determined that the listing of BCUH contracts impact the following Core Principles:

Core Principle 2 - Compliance with Rules:

Trading and delivery of BCUH contracts are subject to the Business Conduct and Trading Practice Rules found in Chapter 4 of the BTNL Rulebook including Rule 403 which forbids pre-arranged, pre-negotiated non-competitive trades. Trading and delivery in these products will also be subject to Market Operations and Discipline and Enforcement Rules found in Chapters 5 and 6, respectively.

Core Principle 3 - Contracts Not Readily Subject to Manipulation:

Multiple domestic and foreign markets trade the underlying BCH product, making manipulation unlikely. Additionally, Trading and delivery of BCUH contracts are not readily subject to manipulation because they are subject to position limits. Daily and Final settlement will be determined in accordance with BTNL Rule 509.

Core Principle 4 - Prevention of Market Disruption:

Trading and delivery of BCUH contracts are subject to prohibitions of market disruption under Chapters 4, 5, and 6 relating to Business Conduct and Trading Practices, Market Operations, and Discipline and Enforcement, respectively. All trading at BTNL Exchange is subject to market surveillance and a robust disciplinary framework.

Core Principle 5 - Position Limits or Accountability:

Trading and delivery of BCUH contracts are subject to position limits set forth in Chapter 15. The position limits are consistent with Commission guidance. Position limits may be adjusted based on market needs.

Core Principle 7 - Availability of General Information:

Prior to the launch of trading of BCUH contracts, product terms and conditions will be available on the BTNL website. Information on delivery of BCUH contracts will be made available on the BTNL website.

Core Principle 8 - Daily Publication of Trading Information:

The Exchange will publish BCUH trading volumes, open interest levels, and price information on its website and through quote vendors.

Core Principle 9 - Execution of Transactions:

Execution of all BCUH contracts will take place on the BTNL electronic trading platform. Electronic execution provides competitive and transparent transactions. All BCUH contracts will be cleared by Bitnomial Clearinghouse, LLC ("BNCH"), a CFTC-registered derivatives clearing organisation ("DCO"), subject to Commission rules and oversight.

Core Principle 10 - Trade Information:

All requisite trade information will be recorded and stored in the audit trail and will be surveilled and monitored in accordance with BTNL Rules.

Core Principle 11 - Financial Integrity of Transactions:

All BCUH contracts will be cleared by BNCH, a CFTC-registered DCO, subject to Commission rules and oversight.

Core Principle 12 - Protection of Markets and Market Participants:

BTNL Rules have set forth numerous requirements and protections to prevent intermediaries from disadvantaging customers.

Core Principle 13 - Disciplinary Procedures:

All BCUH contracts are subject to the protections provided by Chapter 6 of the BTNL Rulebook. Chapter 6 describes the disciplinary procedures of the Exchange that authorize the Exchange to discipline, suspend, or expel Participants that violate Exchange Rules.

Core Principle 14 - Dispute Resolution:

Disputes arising from trading of BCUH contracts must be arbitrated in accordance with BTNL Rules found in Chapter 7. All disputes, controversies or claims between or among themselves that relate to or arise out of any contract or otherwise arise out of one or more transactions made or to be made on the Exchange or subject to the Rules and are based upon facts and circumstances that occurred at a time when the parties were Participants or Customers.

Certification

The Exchange has spoken with Clearing Members and market participants who support the decision to launch Bitcoin Cash US Dollar Hecto Futures contracts. The Exchange is not aware of any substantive opposing views to the BCUH contracts. The Exchange certifies that the BCUH contracts and related rules certified herein comply with the Commodity Exchange Act and the rules and regulations promulgated thereunder.

The Exchange certifies that this submission has been concurrently posted on the Exchange's website at: https://bitnomial.com/exchange/regulation/

If you have any questions or require further information, please contact the undersigned at james.walsh@bitnomial.com.

Sincerely, /s/

James A. Walsh
Chief Regulatory Officer
Bitnomial Exchange, LLC

Bitcoin Cash US Dollar Hecto Futures

Term	Value
Product Name	Bitcoin Cash US Dollar Hecto Futures
Product Code	BCUH
Contract Size	100 BCH (Bitcoin Cash)
Price Quotation	US Dollars per BCH
Tick Size	$0.1 per BCH
Tick Value	~$10.00 per contract
Price Band Variation	$3.2
Price Limit	$200.0
Position Limit	200
Reportable Position Level	25 contracts
Margin	US Dollars
Settlement Method	Deliverable - Chapter 8 & 11
Settlement Price	Rule 517
Options Product Code	N/A
Options Exercise Style	N/A
Options Strike Price	N/A
Listing Interval	