

July 21, 2025
BY ELECTRONIC FILING
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: BTNL 2025-24 - Self-Certification Pursuant to CFTC Regulation 40.2(a)
Certification– Listing of Bitcoin US Dollar Price Over/Under Event 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 US Dollar Price Over/Under Event Futures (“EBUC”) contracts to be offered for trading on BTNL for an intended trade date on or after July 23, 2025.

Contract Description

The EBUC contract is a financially-settled, margined events futures contract based on Bitnomial’s Bitcoin US Dollar Futures (“BUS”) implied spot price. Final settlement of EBUC contracts will be computed according to Bitnomial Rule 509.6 and then compared to the over/under price of the BUS contract. If the computed settlement price is at or above the over/under price of the final settlement price of the BUS contract, the final settlement price of the EBUC contract will be \$1.00. If the computed settlement price is below the over/under price, the final settlement price will be \$0.00. The margin rate for EBUC contracts will be set at 100%. The attached EBUC Product Rules detail the product specifications.

Bitcoin (BTC) Market Overview

Bitcoin is the first and most widely recognized cryptocurrency, designed as a decentralized, peer-to-peer digital currency. It operates on a secure, proof-of-work blockchain, allowing for trustless transactions without the need for intermediaries. Bitcoin’s fixed supply of 21 million coins ensures its scarcity, making it a popular choice for long-term value storage. The Bitcoin network is maintained by a global community of miners and developers who prioritize security, decentralization, and resilience. Layer 2 solutions like the Lightning Network enhance Bitcoin’s utility by enabling fast and low-cost transactions, making it increasingly viable for everyday payments.

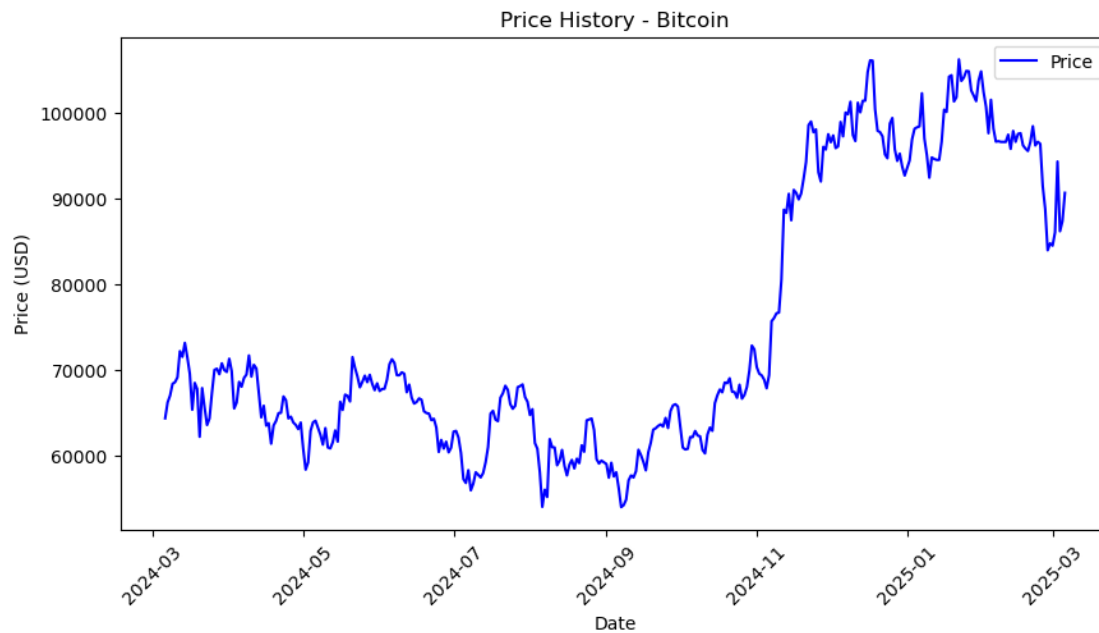
Governance: Bitcoin operates under a decentralized governance model, with protocol changes proposed through Bitcoin Improvement Proposals (BIPs) and adopted by consensus among the community and miners.

Consensus Mechanism: Utilizes Proof of Work (PoW), where miners solve complex mathematical problems to validate transactions and secure the network.

Concentration of Ownership: BTC ownership is relatively decentralized, though early adopters and certain institutional holders possess significant amounts.

Liquidity¹: Bitcoin has a market capitalization of \$1,665,685,215,931.00 and a 30-day spot trading volume of \$39,635,455,195.00, ensuring strong liquidity and accessibility across centralized and decentralized exchanges as well as OTC dealers.

Price History

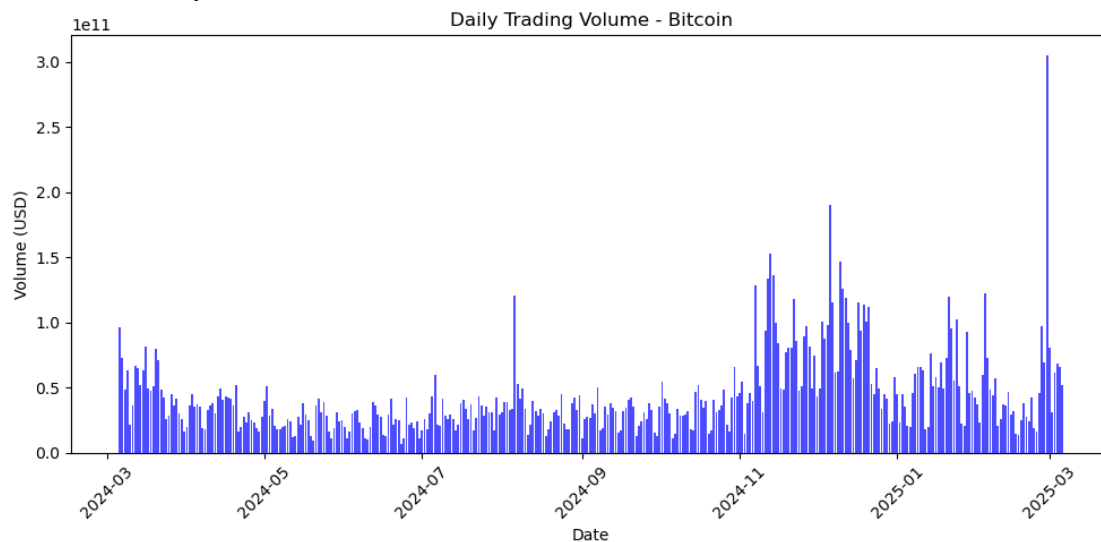


Price Chart

Source: <https://www.coingecko.com>

¹ The Liquidity section reflects updates as of April 23, 2025.

Volume History



Volume Chart

Source: <https://www.coingecko.com>

Deliverable Supply Analysis

- **Current Circulation:** 19,849,878 BTC
- **Total Supply:** 19,849,896 BTC
- **Max Supply:** 21,000,000 BTC
- **Market Cap:** \$1,665,685,215,931.00
- **30 Day Volume:** \$39,635,455,195.00

Core Principal Compliance

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

Core Principle 2 - Compliance with Rules:

Trading and settlement of EBUC contracts are subject to the Business Conduct and Trading Practice Rules found in Chapter 4 of the Bitnomial 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 Bitcoin product, making manipulation unlikely. Additionally, trading and delivery of EBUC contracts are not readily subject to manipulation because they are subject to position limits. Daily and final settlement will be

determined in accordance with Bitnomial Rule 509.

Core Principle 4 - Prevention of Market Disruption:

Trading and settlement of EBUC 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 Bitnomial Exchange is subject to market surveillance and a robust disciplinary framework.

Core Principle 5 - Position Limits or Accountability:

Trading and delivery of EBUC contracts are subject to position limits set forth in Rule 405. 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 EBUC contracts, product terms and conditions will be available on the Bitnomial website.

Core Principle 8 - Daily Publication of Trading Information:

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

Core Principle 9 - Execution of Transactions:

Execution of all EBUC contracts will take place on the Bitnomial electronic trading platform. Electronic execution provides competitive and transparent transactions. All EBUC contracts will be cleared through Bitnomial Clearinghouse, LLC.

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 Bitnomial Rules.

Core Principle 11 - Financial Integrity of Transactions:

All EBUC contracts will be cleared through Bitnomial Clearinghouse, LLC, a registered DCO subject to Commission rules and oversight.

Core Principle 12 - Protection of Markets and Market Participants:

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

Core Principle 13 - Disciplinary Procedures:

All EBUC contracts are subject to the protections provided by Chapter 6 of the Bitnomial 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 EBUC contracts must be arbitrated in accordance with Bitnomial 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

Certifications

Pursuant to Section 5c(c) of the Act and CFTC Regulation 40.2(a), Bitnomial certifies that the listing of EBUC complies with the Commodity Exchange Act, as amended and regulations thereunder. Bitnomial is not aware of any opposing views to the listing of EBUC.

Bitnomial certifies that a copy of this submission has been concurrently posted on its website at <https://bitnomial.com/exchange/regulatory>.

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 US Dollar Price Over/Under Event Futures

Term	Value
Product Name	Bitcoin US Dollar Price Over/Under Event Futures
Product Code	EBUC
Contract Size	\$1.00 per contract
Price Quotation	US Dollars
Tick Size	\$0.01
Tick Value	\$0.01 per contract
Price Band Variation	\$0.01
Price Limit	\$0 - \$1.00
Position Limit	1,000,000 contracts
Reportable Position Level	1,000 contracts
Margin	US Dollars
Settlement Method	Financially - BUS Implied Spot Price
Settlement Price	Rule 509
Options Product Code	N/A
Options Exercise Style	N/A
Options Strike Price Listing Interval	N/A

Additional Term	Value
Date-Time of Event	Contract expiration
Over/Under Price	\$150,000

Final Settlement Outcome Determination

The final settlement will be computed according to Rule 509.6 and then compared to the Over/Under Price. If the computed settlement price is at or above the Over/Under Price, the final settlement price is \$1.00. If the computed settlement price is below the Over/Under Price, the final settlement price is \$0.00.