

May 14, 2026

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 Hedera US Dollar Kilo Perpetual Futures
Contract**

Dear Mr. Kirkpatrick,

Bitnomial Exchange, LLC (“BTNL” or the “Exchange”) hereby submits for self-certification to the Commodity Futures Trading Commission (“CFTC” or the “Commission”) under Commission regulation 40.2(a) its plan to list Hedera US Dollar Kilo Perpetual Futures (“PHBRUK”) contracts to be offered for trading on BTNL for an intended trade date on or after May 18, 2026.

Contract Description

The PHBRUK contract is a cash-settled, margined perpetual futures contract referenced to the **CF Hedera Mid-Price Spot Rate** published by CF Benchmarks (methodology: CF Mid-Price Spot Rates Methodology Guide). The contract size is 5000 HBAR (Hedera). Daily and final settlement prices are calculated under BTNL Rule 509 using the methodology described in Digital Asset Perpetual Pricing, with the Implied Spot Price fixed to the CF Hedera Mid-Price Spot Rate. Attached Exchange Rule “Hedera US Dollar Kilo Perpetual Futures Contract” details the product specifications.

Hedera (HBAR) Market Overview

Hedera Hashgraph is a distributed ledger technology that offers high-speed, low-cost, and energy-efficient transactions. Unlike traditional blockchains, it uses a hashgraph consensus mechanism, enabling greater scalability and finality. Hedera’s ecosystem includes applications in finance, supply chain management, and identity verification. The HBAR token is used for transaction fees, staking, and securing the network, supporting a growing enterprise and developer community.

Governance: Hedera is governed by the Hedera Governing Council, comprising up to 39 term-limited organizations from diverse industries and geographies.

Consensus Mechanism: Utilizes the Hashgraph consensus algorithm, a form of asynchronous Byzantine Fault Tolerance (aBFT) that offers high throughput and low latency.

Concentration of Ownership: HBAR tokens are distributed among the Hedera Council members, developers, and purchasers, with a portion allocated for ecosystem development.

Core Principle Compliance

BTNL has determined that its rules related to the listing of PHBRUK 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 PHBRUK contracts impact the following Core Principles:

Core Principle 2 - Compliance with Rules:

Trading of PHBRUK contracts is 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 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 HBAR product, making manipulation unlikely. Additionally, PHBRUK contracts are not readily subject to manipulation because they are subject to position limits and the daily and final settlement prices are determined by reference to the CF Hedera Mid-Price Spot Rate published by CF Benchmarks, the most widely trusted and referenced digital asset benchmark authority globally. Daily and Final settlement will be determined in accordance with BTNL Rule 509.

Core Principle 4 - Prevention of Market Disruption:

Trading of PHBRUK contracts is 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 of PHBRUK contracts is subject to position limits set forth in the product specifications. 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 PHBRUK contracts, product terms and conditions will be available on the BTNL website.

Core Principle 8 - Daily Publication of Trading Information:

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

Core Principle 9 - Execution of Transactions:

Execution of all PHBRUK contracts will take place on the BTNL electronic trading platform. Electronic execution provides competitive and transparent transactions. All PHBRUK 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 PHBRUK 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 PHBRUK 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 PHBRUK 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 Hedera US Dollar Kilo Perpetual Futures contracts. The Exchange is not aware of any substantive opposing views to the PHBRUK contracts. The Exchange certifies that the PHBRUK 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/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

Hedera US Dollar Kilo Perpetual Futures

Term	Value
Product Name	Hedera US Dollar Kilo Perpetual Futures
Product Code	PHBRUK
Contract Size	5000 HBAR (Hedera)
Price Quotation	US Dollars per HBAR
Tick Size	\$2e-05 per HBAR
Tick Value	\$0.1 per contract
Margin	US Dollars
Price Band Variation	\$620
Price Limit	\$6200
Position Limit	28000
Reportable Position Level	25
Market Hours	24/7; otherwise subject to Rule 501
Contract Listing & Termination	Rule 502
Settlement Method	Cash Settled - Chapter 8 & Rule 509
Settlement Price	Rule 509 - See "CF Mid-Price Spot Rates Daily Settlement Prices"
Options Product Code	N/A
Options Exercise Style	N/A
Options Strike Price	N/A
Listing Interval	

CF Mid-Price Spot Rates Daily Settlement Prices

The Perpetual Futures Contract Settlement Price is calculated per Digital Asset Perpetual Pricing and Rule 509. For this contract, the Implied Spot Price referenced in the perpetual pricing documentation is fixed to the **CF Hedera Mid-Price Spot Rate** published by CF Benchmarks.