September 02, 2026

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 26-096 Self-Certification Pursuant to CFTC Regulation 40.2(a) Certification - Listing of Polkadot US Dollar Deca 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 Polkadot US Dollar Deca Perpetual Futures ("PDOTUD") contracts to be offered for trading on BTNL for an intended trade date on or after September 4, 2026.

Contract Description

The PDOTUD contract is a financially-settled, margined perpetual futures contract based on the price of 100,000 DOT (Polkadot). Attached Exchange Rule "Polkadot US Dollar Deca Perpetual Futures Contract" details the product specifications.

Polkadot (DOT) Market Overview

Polkadot is a multi-chain network that enables interoperability between different blockchains. Its architecture consists of a central relay chain and multiple parachains, allowing projects to build specialized blockchains while benefiting from shared security and scalability. The Polkadot ecosystem supports decentralized applications, DeFi protocols, and governance innovations. DOT, the network's native token, is used for governance, staking, and bonding parachains, ensuring seamless collaboration across the ecosystem.

Governance: Polkadot implements an on-chain governance model where DOT holders can participate in decision-making through referenda, council elections, and treasury management. Source

Consensus Mechanism: Utilizes a Nominated Proof-of-Stake (NPoS) system, where validators are selected based on their stake and nominations from other holders, ensuring security and efficiency.

Concentration of Ownership: DOT tokens were distributed among early investors, the Web3 Foundation, and the community, with mechanisms in place to promote decentralization.

Liquidity: Polkadot has a market capitalization of $1,474,650,757.00 and a 30-day spot trading volume of $2,667,092,496.00, ensuring strong liquidity and accessibility across centralized and decentralized exchanges as well as OTC dealers.

Price History

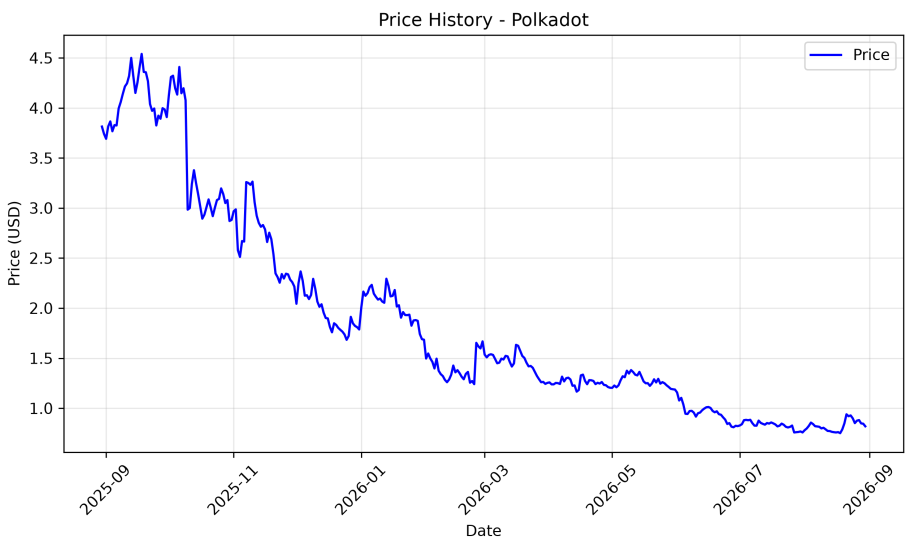

Figure 1: Price Chart

Source: https://www.coingecko.com

Volume History

Source: https://www.coingecko.com

Deliverable Supply Analysis

- **Current Circulation**: 1,700,724,729 DOT
- **Total Supply**: 1,700,744,174 DOT
- **Max Supply**: 2,100,000,000 DOT
- **Market Cap**: $1,474,650,757

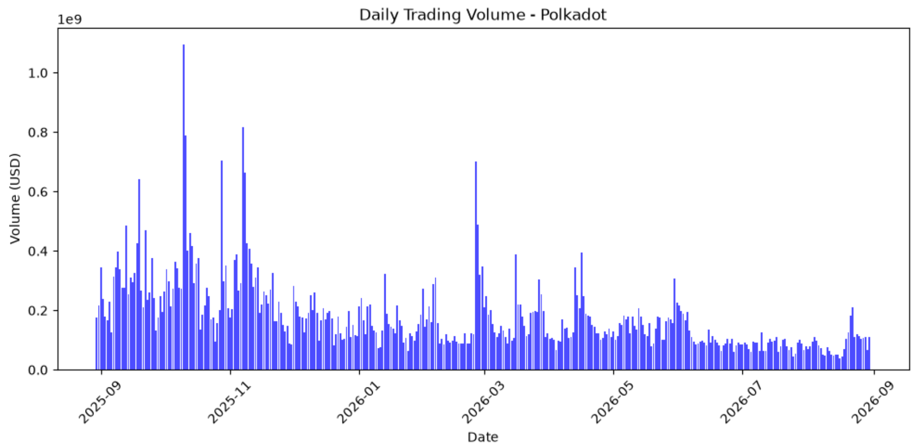

Figure 2: Volume Chart

- **30 Day Volume**: $2,667,092,496

Polkadot trades continuously across a broad set of centralized exchanges, decentralized venues, and OTC dealers, supporting efficient price discovery for the Contract.

The Exchange proposes a contract month position limit of 250 contracts. At the Reportable Contract Size of 100,000 DOT, this represents 25,000,000 DOT, or approximately 1.47% of circulating supply.

Supply, market capitalization, and 30-day spot volume as of August 30, 2026. Source: CoinGecko.

Core Principle Compliance

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

Core Principle 2 - Compliance with Rules:

Trading and delivery of PDOTUD 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 DOT product, making manipulation unlikely. Additionally, Trading and delivery of PDOTUD 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 PDOTUD 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 PDOTUD contracts are 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 PDOTUD contracts, product terms and conditions will be available on the BTNL website. Information on delivery of PDOTUD contracts will be made available on the BTNL website.

Core Principle 8 - Daily Publication of Trading Information:

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

Core Principle 9 - Execution of Transactions:

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

Polkadot US Dollar Deca Perpetual Futures

Term	Value
Product Name	Polkadot US Dollar Deca Perpetual Futures
Product Code	PDOTUD
Reportable Contract Size	100,000 DOT (Polkadot)
Minimum Contract Size	10 DOT (Polkadot)
Price Quotation	US Dollars per DOT
Tick Size	$0.0005 per DOT
Tick Value	$0.005
Price Band Variation	5% of the Reference Price
Price Limit	50% of the Reference Price
Position Limit	250 contracts
Reportable Position Level	25 contracts
Market Hours	Rule 501 - Market Hours - 24/7
Contract Listing & Termination	Rule 502
Settlement Method	Cash Settled - Rule 509 & Chapter 11
Settlement Price	Rule 509.6.3 - Index Price is the CF Polkadot Mid-Price Spot Rate - Settlement Procedures

Funding Rate Methodology

The funding rate methodology for the Contract is published on the Exchange's website at https://bitnomial.com/exchange/docs/market-operations/settlements/digital-asset-perpetual-pricing/.