

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 26-098 Self-Certification Pursuant to CFTC Regulation 40.2(a) Certification - Listing of Hedera US Dollar Hecto 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 Hecto Perpetual Futures (“PHBRUH”) contracts to be offered for trading on BTNL for an intended trade date on or after September 4, 2026.

Contract Description

The PHBRUH contract is a financially-settled, margined perpetual futures contract based on the price of 1,000,000 HBAR (Hedera). Attached Exchange Rule “Hedera US Dollar Hecto 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.

Liquidity: Hedera has a market capitalization of \$3,278,870,270.00 and a 30-day spot trading volume of \$1,844,533,547.00, ensuring strong liquidity and accessibility across centralized and decentralized exchanges as well as OTC dealers.

Price History

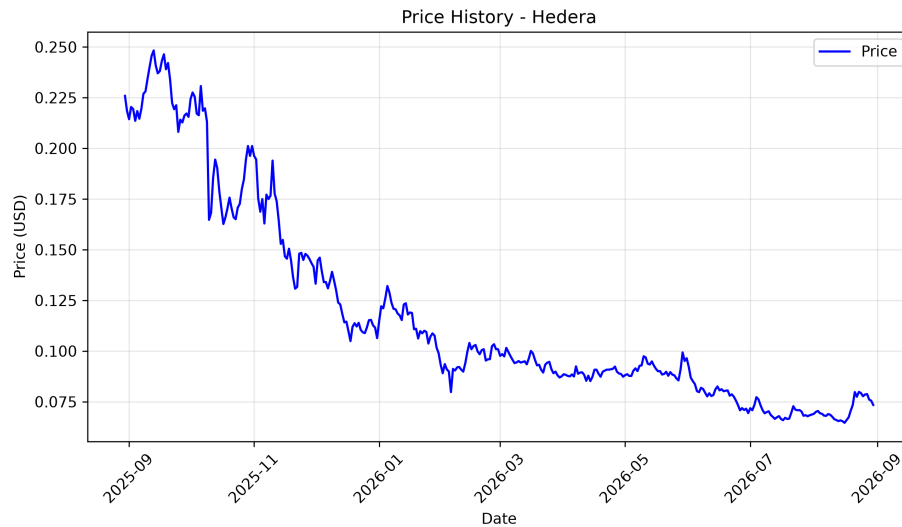


Figure 1: Price Chart

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

Volume History

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

Deliverable Supply Analysis

- **Current Circulation:** 43,831,559,712 HBAR
- **Total Supply:** 50,000,000,000 HBAR
- **Max Supply:** 50,000,000,000 HBAR
- **Market Cap:** \$3,278,870,270
- **30 Day Volume:** \$1,844,533,547

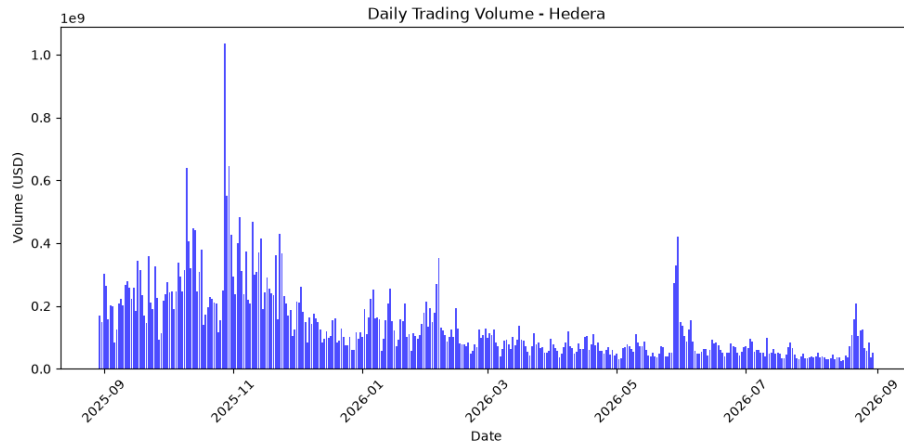


Figure 2: Volume Chart

Hedera 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 140 contracts. At the Reportable Contract Size of 1,000,000 HBAR, this represents 140,000,000 HBAR, or approximately 0.32% 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 PHBRUH 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 PHBRUH contracts impact the following Core Principles:

Core Principle 2 - Compliance with Rules:

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

Core Principle 8 - Daily Publication of Trading Information:

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

Core Principle 9 - Execution of Transactions:

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

Term	Value
Product Name	Hedera US Dollar Hecto Perpetual Futures
Product Code	PHBRUH
Reportable Contract Size	1,000,000 HBAR (Hedera)
Minimum Contract Size	100 HBAR (Hedera)
Price Quotation	US Dollars per HBAR
Tick Size	\$0.00002 per HBAR
Tick Value	\$0.002
Price Band Variation	5% of the Reference Price
Price Limit	50% of the Reference Price
Position Limit	140 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 Hedera 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/>.