

November 19, 2024  
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 2024-008 - Self-Certification Pursuant to CFTC Regulation 40.6 –  
Change of DCO and Delisting of February 2025 and Later BUS and BUI  
Contract Months [Updated November 22, 2024]**

Dear Mr. Kirkpatrick:

Bitnomial Exchange, LLC (“Bitnomial” or the “Exchange”) hereby submits for self-certification to the Commodity Futures Trading Commission (the “Commission” or “CFTC”), under Commission regulation 40.6(a), the following rule to change its derivatives clearing organization (“DCO”) from MIAX Futures Exchange, LLC (“MFE”) to Bitnomial Clearinghouse, LLC (“BCH”). Additionally, the Exchange has made March 2025, June 2025, and September 2025 Bitcoin US Dollar Futures (“BUS”) and Bitcoin US Dollar Deci Futures (“BUI”) contract months unavailable to trade on MFE ahead of relisting on BCH.

Bitnomial Rule 801 has been updated to provide notice to market participants that on January 30, 2025, the Exchange will begin using Bitnomial Clearinghouse, LLC as its DCO for all contracts with expiration months of February 2025 and later.

The Exchange will not list any contracts with an expiration month later than January 2025 on MFE. This includes Bitnomial’s Bitcoin US Dollar Options (“BUSO”) and Hashrate US Dollar Petahash Futures (“HUP”). Contracts with an expiration month of January 2025 and earlier will continue to trade on the Exchange and will be cleared by MFE, Bitnomial’s current DCO.

March 2025, June 2025, and September 2025 BUS and BUI contract months will be made unavailable to trade immediately. There is no open interest in Bitnomial contracts with expiration months later than January 2025. On January 30, 2025, the Exchange will relist all BUS, BUI, BUSO, and HUP contracts with February 2025 expirations and later.

The update to Rule 801 will become effective on December 4, 2024.

Core Principle Compliance

The Exchange will continue to comply with all DCM Core Principles. The Exchange has reviewed the Core Principles as set forth under Section 5 of the Commodity Exchange Act, as amended (the “Act”), and determined that the rule changes will not have an adverse impact on Bitnomial’s compliance with its obligations to adhere to DCM Core Principles.

Certification

Pursuant to Section 5c(c) of the Act and CFTC Regulation 40.6(a), Bitnomial certifies that the updated rules comply with the Act and regulations thereunder. Bitnomial has discussed the new product terms with market participants and is not aware of any opposing views to these changes.

Bitnomial certifies that a copy of 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](mailto:james.walsh@bitnomial.com).

Sincerely, /s/

James A. Walsh  
Chief Regulatory Officer  
Bitnomial Exchange, LLC

**Rule 801      Submission to Clearing House**

(a) Exchange Transactions. Immediately upon execution of an Exchange Transaction as provided in Rule 504(h), such Exchange Transaction shall be discharged and novated in accordance with the rules of the Clearing House.

(b) Beginning January 30, 2025, the Exchange will use Bitnomial Clearinghouse, LLC as its Clearing House for all contracts with expiration months of February 2025 and later.