

March 3, 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 2025-14 - Self-Certification Pursuant to CFTC Regulation 40.6 – Rule 1102 Participant and Clearing Member Delivery Obligations**

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 plans to modify Exchange rule 1102(b). This update is intended to streamline the Exchange’s delivery review and approval process. The proposed change to Exchange rules will become effective on March 17, 2025.

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 name change with market participants and is not aware of any opposing views to this update.

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 1102      Participant and Clearing Member Delivery Obligations**

- (b) Participants are required to register accounts for the purpose of making or taking delivery with the Settlement Facility and Clearinghouse ~~at least 30 days~~ before the start of the delivery period. A Participant may effect delivery only through the Settlement Facility.