

March 5, 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 2025-15 - Self-Certification Pursuant to CFTC Regulation 40.6 –  
Bitnomial Exchange, LLC Incentive Programs Update**

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 two incentive programs, the Participant Liquidity Incentive Program and the Participant Roll Incentive Program (the “Programs”). The changes to the Programs are intended to increase liquidity in the Bitcoin US Dollar Futures (“BUS”) product. The Exchange has also determined to extend the Programs. Changes to the Programs will become effective on March 19, 2025 and will continue until September 19, 2025

- 1) Exhibit 1 sets forth the terms of the Programs.
- 2) Exhibit 2 is Bitnomial’s FOIA request letter.

Core Principal Compliance

Bitnomial has concluded that its compliance with DCM Core Principles is not adversely affected by these changes. 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 change pertains to the following Core Principles:

**Core Principal 2- *Compliance with Rules*:**

The Programs have been established under Bitnomial Rule 314 which allows the Exchange to create programs that provides incentives to Participants willing to add liquidity to Bitnomial markets.

**Core Principle 4 - *Prevention of Market Disruption*:**

The Programs conform with Core Principle 4 and CFTC Regulation 38.251, which expressly provide that a DCM must adopt and implement rules governing market participants subject to its jurisdiction to prevent, detect, and mitigate market disruptions or system anomalies associated with electronic trading.

**Core Principal 7 - Availability of General Information:**

Notification of the existence of the Programs has been posted to <https://bitnomial.com/exchange/regulation/> in compliance with this Core Principal. Interested Market Participants may contact the Exchange for additional information concerning the Programs.

**Core Principal 9 – Execution of Transactions:**

The products included in the Programs are listed for trading in competitive, open, and efficient markets.

**Core Principal 12 - Protection of Markets and Market Participants:**

The Programs will have no effect on the Exchange's duties to protect its markets and Market Participants from abusive, disruptive, fraudulent, noncompetitive and unfair conduct and trade practices.

**Core Principal 18 – Recordkeeping:**

The Exchange is committed to its duties to maintain records pertaining to the Programs in a manner that satisfies the relevant criteria set forth in §1.31 of the Commission's Regulations.

**Core Principle 21, Financial Resources:**

The Programs will not impact the Exchange's ability to discharge its financial, operational, or managerial responsibilities as a DCM.

**Certification**

Pursuant to Section 5c(c) of the Act and CFTC Regulation 40.6(a), Bitnomial certifies that the creation of the Programs complies with the Act and regulations thereunder. Bitnomial is not aware of any opposing views to the changes to the Programs.

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

## **Exhibit 1**

### **Bitnomial Exchange, LLC Bitcoin US Dollar Futures Participant Liquidity Incentive Program**

#### **Purpose**

The Participant Liquidity Incentive Program (the “Program”), offered by Bitnomial Exchange, LLC (the “Exchange”), seeks to incentivize market liquidity.

#### **Eligibility**

Bitnomial Exchange may designate up to five participants (“Program Participants”) in the Program, who are Exchange Participants. In order to be considered for selection into the Program, potential Participants must have provided sufficient liquidity in Bitcoin contracts over the past 5 days at the time of application. Eligible Program Participants must satisfy and maintain the following conditions:

1. Authorized as an Exchange Participant (see Rule 303)
2. Authorized for direct market access

Applicants may apply by emailing [help@exchange.bitnomial.com](mailto:help@exchange.bitnomial.com).

#### **Contracts**

- Bitcoin US Dollar Futures (BUS)

#### **Incentives**

[Redacted]

#### **Obligations**

[Redacted]

#### **Surveillance and Termination of Status**

The Exchange surveils trading activity and performance and may, at its sole discretion, revoke Program Participant status if it concludes from its own review that a Program Participant did not, or no longer, meets the eligibility requirements or otherwise fails to meet the obligations of the Program.

Program Participants may be required to provide the Exchange with information acceptable to the Exchange demonstrating performance of their obligations.

#### **Other Agreements**

Each Program Participant agrees to receive requests for quotes for contracts outside of Program obligations where liquidity may be insufficient for customers to execute a large trade. The Participant is under no obligation to respond to the request for quote.

#### **Term**

The Program and Program Participant appointments begin on October 17th, 2024 and expire on ~~April 17th~~September 19th, 2025.

**Bitnomial Exchange, LLC  
Bitcoin US Dollar Futures  
Participant Roll Incentive Program**

**Purpose**

The Participant Roll Incentive Program (the “Program”), offered by Bitnomial Exchange, LLC (the “Exchange”), seeks to incentivize market liquidity during the roll period, as defined in Bitnomial Rule 1206.

**Eligibility**

Bitnomial Exchange may designate up to five participants (“Program Participants”) in the Program, who are Exchange Participants. In order to be considered for selection into the Program, potential Participants must have provided sufficient liquidity in Bitcoin contracts over the past 5 days at the time of application. Eligible Program Participants must satisfy and maintain the following conditions:

3. Authorized as an Exchange Participant (see Rule 303)
4. Authorized for direct market access
5. Approved for physical delivery

Applicants may apply by emailing [help@exchange.bitnomial.com](mailto:help@exchange.bitnomial.com).

**Contracts**

- Bitcoin US Dollar Futures (BUS)

**Incentives**

[REDACTED]

**Obligations**

[REDACTED]

**Surveillance and Termination of Status**

The Exchange surveils trading activity and performance and may, at its sole discretion, revoke Program Participant status if it concludes from its own review that a Program Participant did not, or no longer, meets the eligibility requirements or otherwise fails to meet the obligations of the Program.

Program Participants may be required to provide the Exchange with information acceptable to the Exchange demonstrating performance of their obligations.

**Other Agreements**

Each Program Participant agrees to receive requests for quotes for contracts outside of Program obligations where liquidity may be insufficient for customers to execute a large trade. The Participant is under no obligation to respond to the request for quote.

**Term**

The Program and Program Participant appointments begin on October 17th, 2024 and expire on ~~April 17th~~September 19th, 2025.