

May 28, 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 2026-62 - Self-Certification Pursuant to CFTC Regulation 40.6 – Sui  
US Dollar Spot Contract Terms 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 update the Sui US Dollar Spot contract terms. The proposed changes will become effective on June 11, 2026.

Core Principle Compliance

The Exchange will continue to comply with all designated contract market (“DCM”) Core Principles. The Exchange has reviewed DCM Core Principles and determined that the change will not have an adverse impact on the Exchange’s compliance with its obligation to adhere to Core Principles.

Certification

Pursuant to Section 5c(c) of the Act and CFTC Regulation 40.6(a), Bitnomial certifies that the updated contract rules comply with the Act and regulations thereunder. Bitnomial has discussed the modifications 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/regulatory>.

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

# Sui US Dollar Spot

Term	Value
Product Name	Sui US Dollar Spot
Product Code	SUIUSD
Contract Size	<del>0.00001</del> <u>0.00000001</u> SUI (Sui)
Price Quotation	US Dollars per SUI
Tick Size	\$0.0001 per SUI
Tick Value	<del>\$0.000000001</del> <u>\$0.000000000001</u> per contract
Price Band Variation	+/- 10% of the BBO midpoint
Price Limit	+/- 50% from previous session price
Position Limit	Long <del>130,000,000,000</del> <u>130,000,000,000,000</u> contracts (1300000 SUI) / Short <del>98,000,000,000</del> <u>98,000,000,000,000</u> contracts (980000 SUI)
Reportable Position Level	<del>49,000,000,000</del> <u>49,000,000,000,000</u> contracts (490000 SUI)
Market Hours	24 hours per day, 7 days per week, subject to Rule 501
Contract Listing & Termination	Rule 502 & Rule 514
Settlement Method	Deliverable - Rule 813 & Chapter 11; positions below the De Minimis Delivery Threshold are Cash Settled
De Minimis Delivery Threshold	\$0.50
Settlement Price	Rule 509 & Chapter 11
Accepted Order Types	Limit, Market, Stop Loss, Stop Loss Limit, Take Profit, Take Profit Limit, Trailing Stop, Trailing Stop Limit, Iceberg