

June 29, 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 2026-69 - Self-Certification Pursuant to CFTC Regulation 40.6 –  
Avalanche 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 Avalanche US Dollar Spot contract terms. The tick size will change to \$0.001 per Avalanche token. The proposed changes will become effective on July 14, 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

## Avalanche US Dollar Spot

Term	Value
<b>Product Name</b>	Avalanche US Dollar Spot
<b>Product Code</b>	AVAXUSD
<b>Contract Size</b>	0.00000001 AVAX (Avalanche)
<b>Price Quotation</b>	US Dollars per AVAX
<b>Tick Size</b>	\$0.001 per AVAX
<b>Tick Value</b>	\$0.0000000001 per contract
<b>Price Band Variation</b>	+/- 5% of the BBO midpoint
<b>Price Limit</b>	+/- 50% from previous session price
<b>Position Limit</b>	Long 8,800,000,000,000 contracts (88000 AVAX) / Short 7,100,000,000,000 contracts (71000 AVAX)
<b>Reportable Position Level</b>	3,550,000,000,000 contracts (35500 AVAX)
<b>Market Hours</b>	Rule 501 - Market Hours - 24/7
<b>Contract Listing &amp; Termination</b>	Rule 502 & Rule 514
<b>Settlement Method</b>	Deliverable - Rule 813 & Chapter 11; positions below the De Minimis Delivery Threshold are Cash Settled
<b>De Minimis Delivery Threshold</b>	\$0.50
<b>Settlement Price</b>	Rule 509 & Chapter 11
<b>Accepted Order Types</b>	Limit, Market, Stop Loss, Stop Loss Limit, Take Profit, Take Profit Limit, Trailing Stop, Trailing Stop Limit, Iceberg