BITNOMIAL

October 2, 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 2026-120 - Self-Certification Pursuant to CFTC Regulation 40.6 – Cardano US Dollar Spot 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 Cardano US Dollar Spot contract terms. The tick size will change to $0.0001 per ADA token. The tick value will change to $0.000000000001 per contract. The proposed changes will become effective on October 19, 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.

Sincerely, /s/

James A. Walsh
Chief Regulatory Officer
Bitnomial Exchange, LLC

Cardano US Dollar Spot (ADAUSD)

Term	Value
Product Name	Cardano US Dollar Spot
Product Code	ADAUSD
Contract Size	0.00000001 ADA (Cardano)
Price Quotation	US Dollars per ADA
Tick Size	$0.000~~00~~1 per ADA
Tick Value	$0.~~00~~000000000001 per contract
Price Band Variation	+/- 7.5% of the BBO midpoint
Price Limit	+/- 50% from previous session price
Position Limit	Long 400,000,000,000,000 contracts (4,000,000 ADA) / Short 400,000,000,000,000 contracts (4,000,000 ADA)
Reportable Position Level	200,000,000,000,000 contracts (2,000,000 ADA)
Market Hours	Rule 501 - Market Hours - 24/7
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