BITNOMIAL

October 30, 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 2026-130 - Self-Certification Pursuant to CFTC Regulation 40.6 – Bitnomial Clearinghouse, LLC - Rules 514 and 806 Update

Dear Mr. Kirkpatrick:

Bitnomial Clearinghouse, LLC ("Bitnomial" or the "Clearinghouse") hereby submits for self-certification to the Commodity Futures Trading Commission (the "Commission" or "CFTC"), under Commission regulation 40.6(a), updates to Bitnomial Rules 514: Spot Trading and 806: Responsibilities of Clearing Members. The updates are being made to align with recent Commission guidance related to Section 2(c)(2)(D) of the Commodity Exchange Act (the "Act"). The updates will become effective on November 16, 2026.

Core Principle Compliance

Bitnomial will continue to comply with all derivatives clearing organization ("DCO") Core Principles. Bitnomial has reviewed the Core Principles as set forth under Section 5 of the Act, and determined that the Rule update may have some bearing on the following DCO Core Principles:

Core Principle B- Financial Resources: Bitnomial will continue to maintain adequate financial resources to discharge its responsibilities as a DCO.

Core Principle D- Risk Management: The changes continue to ensure Bitnomial's ability to manage the risks associated with discharging the responsibilities of a DCO, including limiting exposure to potential losses from defaults, and maintaining margin requirements sufficient to cover potential exposures in normal market conditions.

Core Principle E- Settlement Procedures: Bitnomial will continue to complete money settlements on a timely basis to reduce risk exposure.

Core Principle F- Treatment of Funds: This core principle ensures DCOs properly manage and protect funds held on behalf of Clearing Members and their customers. Bitnomial's updates continue to require the Clearinghouse to manage and protect all margin payments.

Core Principle L- Public Information: Bitnomial is publicly posting this self-certification letter on its website to ensure that market participants receive advance notice of this update.

Certification

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

Bitnomial certifies that a copy of this submission has been concurrently posted on Bitnomial'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 Compliance Officer
Bitnomial Clearinghouse, LLC

Bitnomial Exchange, LLC &
Bitnomial Clearinghouse, LLC

Rulebook Changes

Rule 514: Spot Trading

1. **Spot Contracts Offered.**
    1. **Authorization and Treatment.** The Exchange is authorized to designate for listing and trading commodity spot contracts ("Spot Contracts"), including where applicable, those Spot Contracts that constitute retail commodity transactions, as defined in CEA Section 2(c)(2)(D), 7 U.S.C. 2(c)(2)(D). Subject to the rules herein, all Spot Contracts shall be treated by the Exchange as if they are futures contracts.
    2. **Actual Delivery Exemption.** The Exchange shall treat all Spot Contracts as retail commodity transactions regardless of whether any individual transaction may ultimately qualify for the actual delivery exemption under CEA Section 2(c)(2)(D)(ii)(III)(aa), 7 U.S.C. 2(c)(2)(D)(ii)(III)(aa).
2. **Financing.**
    1. **Availability.** Financing may be offered to Customers and Participants specifically for the purpose of funding trading and settlement activity related to Exchange Spot Contracts. Such financing shall be contractual, documented in writing, and subject to inspection by the Exchange.
    2. **Lenders.** Financing provided by a third-party lender, affiliate of an FCM, or other market participant shall constitute activity by a Person acting in concert with the Exchange so long as such financing is specifically for the purpose of funding trading and settlement activity related to Spot Contracts offered on the Exchange.
3. **Clearing.** Spot Contract transactions designated hereunder shall be subject to the mandatory clearing requirements set forth in CFTC Rule 38.601, 17 CFR § 38.601, and shall be cleared by the Clearinghouse as set forth in Chapter 8.~~Consistent with CEA Section 2(c)(2)(D), 7 U.S.C. 2(c)(2)(D), cleared Spot Contract customer collateral shall not be treated as segregated customer funds under CEA Section 4d, 7 U.S.C. 6d.~~
4. **Settlement and Delivery.** Spot Contracts shall be subject to the settlement and delivery procedures set forth in Chapter 11.

Rule 806: Responsibilities of Clearing Members

Each Clearing Member shall, and where applicable, shall cause all of its employees and agents to:

1. ensure that all funds deposited with the Clearinghouse on behalf of futures and futures options Customers of a Clearing Member shall be held in an account identifiable as "Customer Segregated" in accordance with the CEA and CFTC Rule 1.20, as amended, and ensure that all funds deposited with the Clearinghouse on behalf of cleared swaps Customers of a Clearing Member shall be held in an account identifiable as "Cleared Swaps Customer Collateral" in accordance with the CEA and CFTC Rule 22.2 and CEA and CFTC Rule 22.3, as amended. Additionally, fulfill the segregation acknowledgment letter requirements as per CEA and CFTC Rule 22.5 for Customer deposits. These funds must be segregated from other funds and treated as belonging to the respective Customers~~. Notwithstanding the foregoing, Section 2(c)(2)(D) of the CEA does not incorporate Section 4d customer fund segregation requirements, and therefore cleared spot customer funds are not treated as segregated customer funds under Section 4d.~~;
2. ensure that the investment of all funds deposited with the Clearinghouse on behalf of Customers of a Clearing Member complies with the investment standards of the CEA and CFTC Rule 1.25, as amended, including, but not limited to, concentration limits and permitted investments;
3. comply with and act in a manner consistent with the Rules and any rules of or agreement with a settlement facility, as applicable;
4. ensure that all clearing activity conducted by the Clearing Member is performed in a manner that is consistent with the Rules;
5. ensure that only the Clearinghouse's facilities are used to conduct clearing business pursuant to the Rules or which is required to be conducted pursuant to the Rules;
6. ensure that the Clearinghouse's facilities are used in a responsible manner and are not used for any improper or wrongful purpose;
7. meet all financial requirements required under the Rules;
8. guarantee and assume complete responsibility for all Contracts submitted by it or which it has authorized another Person to submit for clearing in its name;
9. observe high standards of integrity, market conduct, commercial honor, fair dealing and just and equitable principles of trade in the conduct of its clearing business with the Clearinghouse in the conduct of its business as a Clearing Member or any aspect of any business connected with or concerning the Clearinghouse;
10. immediately inform the Clearinghouse of any changes to the account information provided by the Clearing Member;
11. keep User IDs and passwords confidential;
12. promptly review and, as necessary, respond to all communications issued by the Clearinghouse;
13. keep, or cause to be kept, complete and accurate books and records as required to be maintained pursuant to the CEA and CFTC Rules for the time and in the manner specified by CFTC Rules; and make such books and records available for inspection by a representative of the Clearinghouse, the CFTC and other Governmental Authority of competent jurisdiction;
14. not knowingly mislead or conceal any material fact or matter in any dealings or filings with the Clearinghouse or in connection with a disciplinary action;
15. be responsible, even after it has withdrawn as a Clearing Member, for any violations of Rules committed by it while it was a Clearing Member;
16. cooperate with the Clearinghouse and any Governmental Authority in any inquiry, investigation, audit, examination or proceeding;

17. adopt, adhere to and enforce risk management and other policies and procedures that are designed to address the risks that the Clearing Member poses to the Clearinghouse and promptly provide, upon request by the Clearinghouse or the CFTC, information related to the risk management policies, procedures and practices of the Clearing Member;

18. coordinate with the Clearinghouse to develop and test business continuity and disaster recovery plans that enable effective resumption of daily processing, clearing and settlement following a disruption;

19. in the case of an ECM that is an FCM, develop and implement a written compliance program approved in writing by senior management of such Clearing Member that is reasonably designed to achieve and monitor the Clearing Member's compliance with all applicable requirements of the Bank Secrecy Act (31 U.S.C. § 5311 et seq.), the International Emergency Economic Powers Act (50 U.S.C. § 1701 et seq.) ("IEEPA"), the Trading with the Enemy Act (50 U.S.C. App. § 1 et seq.) ("TWEA"), and the Executive Orders and Rules issued pursuant thereto, including the Rules issued by the U.S. Department of the Treasury and, as applicable, the CFTC. The compliance program shall, at a minimum:

    1. establish and implement policies, procedures and controls reasonably designed to assure compliance with all applicable provisions of the Bank Secrecy Act, IEEPA, TWEA, and all applicable Executive Orders and Rules issued pursuant thereto;
    2. provide for independent testing for compliance to be conducted by Clearing Member personnel or by a qualified outside party;
    3. designate an individual or individuals responsible for implementing and monitoring the day-to-day operations and internal controls of the program; and
    4. provide ongoing training for appropriate personnel; and

20. ensure that sufficient collateral is on deposit with the Clearinghouse to cover the maximum possible loss for any Fully Collateralized Swap position prior to holding such position, in accordance with 17 CFR § 39.2.