



April 22, 2020

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: MODIFICATION: Eris Exchange, LLC Submission #2020-01EM: Relating to Amendments to the Eris Exchange Rulebook Incorporating Fork Policy (Eris Exchange, LLC Submission #2020-01E)

Dear Mr. Kirkpatrick:

Previously, pursuant to Submission #2020-01E, Eris Exchange, LLC (“Eris Exchange” or the “Exchange”) submitted for self-certification to the Commodity Futures Trading Commission (the “CFTC” or the “Commission”), under Commission regulation 40.6(a), amendments to Eris Exchange Rulebook (the “Rulebook”) that, among other things, adopt Exchange Rule 911. After further discussion with CFTC staff, the Exchange has revised the language of Rule 911.

Exchange Rule 911 is set forth in Exhibit A, with the revised language denoted.

A copy of this submission has been concurrently posted on the Exchange’s website at <https://www.erisx.com/regulation/exchange-notices/> under “CFTC Submissions.”

Eris Exchange, LLC hereby certifies to the Commodity Futures Trading Commission, that this submission complies with the Commodity Exchange Act, as amended, and the regulations promulgated thereunder.

If you have any questions or require further information, please contact the undersigned at michael.piracci@erisx.com.

Sincerely,

/s/

Michael A. Piracci
Senior Counsel
Eris Exchange, LLC

Exhibit A

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RULE 911. Policy on Division or Similar Events Involving Digital Currency

In the event that there is, or there is expected to be, a change to the relevant operating rules, protocols, processes, or standards applicable to a Digital Currency underlying a Contract offered by the Exchange, including a so-called hard fork, user activated soft fork, or other event that results in split or division of the Digital Currency into multiple assets, a substitution, replacement, conversion or exchange of the Digital Currency into or for another asset, a restriction on the transfer of the Digital Currency (e.g.; a lock-up or freeze), or a distribution of any asset to existing holders of the Digital Currency (including a so-called airdrop), the Exchange shall have the discretion to take action in consultation with Participants to align the exposures of Persons having positions in the relevant Digital Currency Contracts with the cash market exposures or to otherwise address such events, as appropriate. Appropriate action may include revising delivery obligations under the Contract, providing for cash adjustments, and/or assigning newly listed Contract positions to such Persons. Among other things, the Exchange will take into consideration whether any resulting asset, substitution, replacement, conversion or exchange described in this paragraph continues to be a commodity subject to the Commodity Exchange Act, or is subject to the Securities Act of 1933 or any other law or regulation.

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