

**FMX Futures Exchange, L.P.**  
**Amendment to 2-Year Treasury Futures Contract Rule V-2**  
**Submission #2025-09**  
**May 5, 2025**

**Via Electronic Portal**

Christopher J. Kirkpatrick  
Office of the Secretariat  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, D.C. 20581

1. FMX Futures Exchange, L.P. (“FMX” or the “Exchange”) hereby certifies to the Commodity Futures Trading Commission (“CFTC” or “Commission”) the attached amendment to Rule V-2 of the FMX Rulebook in accordance with CFTC Regulation 40.6(a).
2. The proposed effective date of the amendment to the Rule is on or after May 19, 2025.
3. Attached please find a certification that: (1) this rule complies with the Commodity Exchange Act and the Commission’s regulations thereunder; and (2) concurrent with this submission, the Exchange posted on its website: (i) a notice of pending certification of this rule submission with the Commission; and (ii) a copy of this submission.<sup>1</sup>
4. A concise explanation of the amendment to the Rule appears below.
5. No opposing views to this amendment to the Rule were expressed to FMX.

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**OPERATION, PURPOSE AND EFFECT OF THE PROPOSED  
AMENDMENT TO FMX RULE V-2**

The Exchange is revising Rule V-2(a) to clarify the language used to describe the deliverable specifications under the FMX 2-Year Treasury Futures Contract. The Exchange will publish this change to the contract specifications for the FMX 2-Year Treasury Futures Contract on the FMX website<sup>2</sup> as shown in Exhibit B. The rule amendment clarifies that U.S. Treasury notes delivered in fulfillment of the FMX 2-Year Treasury Futures Contract must have been issued by the U.S. Treasury with an original term to maturity of not more than five years and three months and a remaining term to maturity of no less than one year and nine months *from the first day of the*

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<sup>1</sup> See <https://www.fmxfutures.com/rules-notice/regulatory-notice/>. Capitalized terms used but not defined herein shall have the meanings given to such terms in the FMX Rules, and references to “FMX Rules” or an “FMX Rule” refer to such rules.

<sup>2</sup> See <https://www.fmxfutures.com/products/ust-futures-contracts/>

*contract's named month and not more than two years from the last day of the contract's named month.*

In addition to this Rule Amendment, the Exchange is providing clarifications to the 40.2 Product Certification (FMX Submission #2025-04) in accordance with the amendment to Rule V-2(a) described above in Exhibit C.

Based on its review, FMX has identified the following Core Principles as relevant to its assessment of the Rule amendment:

- ***Core Principle 2, Compliance with Rules.*** FMX believes that the rule amendment will not affect its ability to monitor and enforce compliance with its own rules, including the terms and conditions of any contracts to be traded on the Exchange.
- ***Core Principle 3, Contracts not Readily Susceptible to Manipulation.*** FMX believes that the contract terms and specifications, as clarified and amended, are not readily susceptible to manipulation.
- ***Core Principle 7, Availability of General Information.*** FMX is making information about the contract rule and contract terms and specifications of the FMX 2-Year Treasury Futures Contract available to the Commission, its regulatory services provider, all Participants, Customers, and the public. The Exchange will publish contract terms and specifications on the FMX website at the following link: <https://www.fmxfutures.com/products/ust-futures-contracts/>.

## EXHIBIT A

### Amendment to FMX Rule V-2

Addition is underlined and presented in blue

Deletion is struck through and presented in red

## CHAPTER V – FMX DIVISION CONTRACTS

### Chapter V Contract Rules

[ . . . ]

#### V-2 2-Year U.S. Treasury Note Futures

(a) Scope and underlying

This Rule V-2 governs the trading in 2-Year U.S. Treasury note Futures Contracts. U.S. Treasury notes delivered in fulfillment of this Contract must have fixed principal amounts (*i.e.*, not adjusted for inflation), pay semi-annual coupons in an amount fixed at the time of original issuance, and have been issued by the U.S. Treasury with an original term to maturity of not more than five years and three months and a remaining term to maturity of no less than one year and nine months from the first day of the contract's named month and not more than two years from the last day of the contract's named month.

(i) Contracts in the expiring Contract month open after trading has ceased in that month shall be settled by delivery of U.S. Treasury notes by the Clearing Member with the short position to the Clearing Member with a long position in accordance with the delivery process provisions contained in Rule V-2A.

(ii) When calculating term to maturity for purposes of delivery, the beginning of the term is the first day of the delivery month, and the term extends to the final maturity date rounded down to the nearest month or year.

(b) Trading unit

The trading unit in the Contract is \$200,000 face value of 2-year U.S. Treasury notes with identical coupon and maturity date.

(c) Prices

Contracts are priced in terms of 100 points and 32<sup>nd</sup>s of a point, where one-point equals \$2,000. The minimum price fluctuation for Contracts traded pursuant to this Rule is one-eighth of one 32<sup>nd</sup> (\$7.8125).

(d) Daily price limit

The daily price limit shall be one point. In accordance with Rule XI-4 the Exchange may adjust the price limit under extraordinary market conditions.

(e) Contract months traded

The Exchange shall list at least the next three Contract months in the March quarterly cycle at all times.

(f) Hours for trading

Trading in the Contract shall be conducted on each Trading Day from 9:00 p.m. New York City time on the calendar day prior to the Trading Day until 5:00 p.m. New York City time except on the Last Trading Day when trading in the expiring Contract shall cease no later than 1:01 p.m. The Exchange may extend or limit the hours for trading after proper notification to the CFTC and posting the change on its website.

(g) Block Trades

Reserved.

(h) Last Trading Day

The Last Trading Day in an expiring Contract shall be the last Business Day of the Contract month. All Contracts in the expiring month open after trading has ceased must be physically delivered on or before the third Business Day after the Last Trading Day of the Contract month.

(i) Position Accountability

In accordance with Rule XI-3 the Position Accountability level for 2-year U.S. Treasury note Futures is 7,500 contracts in any one month or all months combined.

(j) Position Limit

In accordance with Rule XI-3 the spot month Position Limit for 2-year U.S. Treasury note Futures is 40,000 contracts. The spot month Position Limit is effective on the close of trading ten (10) Business Days prior to the Last Trading Day in the expiring Contract month.

## **V-2A Deliveries on 2-year U.S. Treasury Note Futures**

Notwithstanding any provision to the contrary in this Chapter V, deliveries against 2-year U.S. Treasury note Futures Contracts may occur on any Business Day of the expiring Contract month as well as on the three next Business Days after the Last Trading Day of the Contract month. The Short Clearing Member elects the delivery date by notifying LCH Limited of its intention to deliver. All deliveries are assigned by LCH Limited to Long Clearing Members. All deliveries are concluded through book-entry transfer of securities.

(a) Delivery unit

The 2-year U.S. Treasury note delivered against a Contract shall be of a single issue. Such 2-year U.S. Treasury note shall have been issued with an original term to maturity of not more than five years and three months and a remaining term to maturity of ~~shall have~~ no less than one year and nine months from the first day of the contract's named month and not more than two years ~~remaining term to maturity at the time of delivery~~ from the last day of the contract's named month. A Short Clearing Member delivering more than one Contract may deliver different issues of 2-year U.S. Treasury notes provided that each Contract unit must be the same issue.

(b) Notifications

(i) Delivery is a three-day process that begins with Intention Day, followed by Notice Day, then followed by the Delivery Day.

(ii) The second Business Day prior to the first Business Day of the Contract month is the "First Intention Day" for deliveries on 2-year U.S. Treasury note Futures Contracts. The following Business Day is "First Notice Day". The "First Delivery Day" is the first Business Day of the contract delivery month.

(iii) The "Last Intention Day" is the first Business Day of the next following calendar month. "Last Notice Day" and "Last Delivery Day" are the ensuing second and third Business Days, respectively.

(iv) Beginning on the First Notice Day and continuing on each Business Day for the rest of the expiring Contract month, each Clearing Member holding open long positions in the expiring Contract shall inform LCH Limited of the date each open Contract position was established.

(v) A Short Clearing Member may inform LCH Limited of its intention to deliver 2-year U.S. Treasury notes until 7:00 PM Eastern time on any Intention Day. When notifying LCH Limited of its intention to deliver, the Short Clearing Member shall provide all necessary information in the form required by LCH Limited, which will assign intended deliveries to Clearing Members with long open positions.

(vi) The following Business Day, the Notice Day, all Short Clearing Members that intend to deliver must, by 3:00 PM Eastern time or 4:00 PM if the Last Notice Day, provide invoices for the U.S. Treasury notes being delivered. LCH Limited will provide such invoices to the Long Clearing Members assigned deliveries. By 5:00 PM Eastern time on this day, all assigned Long Clearing Members must provide the matched Short Clearing Member a banking notification that includes banking information and such other information as LCH Limited may require to complete timely deliveries against payments for 2-Year U.S. Treasury note Futures.

(c) Invoices

(i) The Short Clearing Member shall prepare an invoice for the converted price of the note to be delivered plus accrued interest payable on that note. The converted price is the daily Settlement Price on the Intention Day, except that when the Intention Day occurs on or after the Last Trading Day the converted price is based on the Final Settlement Price for the expiring Contract

month. The conversion factor is the price at which a fixed-rate note that has the specific coupon and remaining term to maturity would yield 6%.

(ii) The invoice shall include the note's CUSIP number, maturity date, coupon rate and all additional information required by LCH Limited.

(iii) For each lot of one or more Contracts to be delivered by the Short Clearing Member, the invoiced amount shall be rounded to the nearest cent with half cents rounded up to the nearest cent.

(d) Delivery

(i) Delivery shall occur by no later than 2:00 PM Eastern time on the Delivery Day by transfer of book entry securities by the Short Clearing Member to the account of the Long Clearing Member and payment of the invoiced amount by the Long Clearing Member to the Short Clearing Member.

(ii) By 8:30 AM Eastern time on the Delivery Day, the Long Clearing Member shall have made sufficient funds to satisfy the invoice amount available to its bank, directed its bank to accept the deliverable U.S. Treasury notes into its account, and instructed the bank to transfer federal funds to the Short Clearing Member's bank account.

(iii) If the Long Clearing Member disputes any of the terms of the Short Clearing Member's invoice, the Long Clearing Member must inform the Short Clearing Member promptly. Any dispute over invoiced amounts must be settled by 10:30 AM Eastern time on the Delivery Day.

(iv) By 11:00 AM Eastern time on Delivery Day, the Short Clearing Member shall have deposited the deliverable notes in its account at its bank and have instructed its bank to transfer the 2-year U.S. Treasury notes to the Long Clearing Member's bank account. Once the deliverable notes are received in the Long Clearing Member's account, the Long Clearing Member's bank shall transfer the invoiced amount to the Short Clearing Member's account at its bank.

## **V-2B Delivery Banks for 2-Year U.S. Treasury Note Futures**

Banks used by Clearing Members to make and take deliveries on 2-year U.S. Treasury note Futures Contracts and to make or receive payments for deliveries in accordance with these Rules shall be commercial banks that have greater than \$100 million in capital and are members of the Federal Reserve System. For purposes of this Rule, capital includes capital, surplus and undivided earnings.

## Exhibit B

### Changes to Contract Terms and Specifications on the FMX Website

Addition is underlined and presented in blue

Deletion is struck through and presented in red

#### FMX UST 2YR Contract

Parameter	Description		
<b>Contract Underlying</b>	\$200,000 face value at maturity U.S. Treasury Note		
<b>Type of Contract</b>	Physically-settled Futures Contracts with Daily Variation Margin Payment		
<b>Central Counterparty</b>	LCH Limited		
<b>Trading Hours</b>	Sunday to Friday 9:00 PM - 5:00 PM (ET) daily		
<b>Quotation Display &amp; Value</b>	Points and fractions of points with par on the basis of 100 points, 1 point = \$2,000		
<b>Minimum Tick Size</b>	<b>Trade Type</b>	<b>Tick Size</b>	<b>Tick Value</b>
	Outright and calendar spread	1/8 of 1/32nd of a point (0.00390625)	\$7.8125
<b>Accountability Level</b>	7,500 contracts (any one month or all months combined)		
<b>Position Limit</b>	40,000 contracts (spot month only)		
<b>First Intention Day</b>	Second Business Day prior to the first calendar day of the delivery month.		
<b>Last Intention Day</b>	First Business Day of the next following calendar month after contract's named delivery month.		
<b>Settlement Style</b>	Physical settlement. Delivery of a note selected from the basket of approved deliverable U.S. Treasury notes.		
<b>Deliverable Note Standards</b>	U.S. Treasury notes that have an original term to maturity of not more than 5 years and 3 months and a remaining term to maturity of at least 1 year and 9 months from the first day of the <del>Futures-delivery</del> <u>contract's named</u> month and not more than 2 years from the last day of the <del>Futures-delivery</del> <u>contract's named</u> month. The delivery invoice amount equals the Futures Settlement Price times a conversion factor, plus accrued interest. The conversion factor is the price of the delivered note (\$1par value) to yield 6 percent.		
<b>Listed Contracts</b>	The three nearest quarterly months of the March, June, September and December cycle.		
<b>Daily Settlement Price (DSP)</b>	The DSP is determined at 3:00 PM ET.		
<b>Final Settlement Price (FSP)</b>	The FSP will be calculated on the Last Trading Day at 1:01 PM ET and disseminated shortly afterwards.		

<b>Delivery Period</b>	First Business Day of the Contract's delivery month extending to and including the third Business Day of month following the Contract's delivery month.
<b>Last Trading Day</b>	The last Business Day of the delivery month. On the Last Trading Day, trading in the front delivery month will cease at 1:01 PM ET.



## Exhibit C

### Clarifications to 40.2 Product Certification (FMX Submission #2025-04)

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Deletion is struck through and presented in red

[. . .]

#### EXPLANATION AND ANALYSIS OF THE CONTRACT'S COMPLIANCE WITH APPLICABLE CORE PRINCIPLES AND COMMISSION REGULATIONS

##### SECTION 1—DESCRIPTION OF UST 2YR FUTURES

[. . .]

The Contract provides for physical delivery of U.S. Treasury securities via the Federal Reserve book-entry wire-transfer system. Each Contract has a deliverable grade that consists of U.S. Treasury notes that have an original term to maturity of not more than 5 years and 3 months and a remaining term to maturity of at least 1 year and 9 months from the first day of the ~~Futures~~ delivery contract's named month and not more than 2 years from the last day of the ~~Futures~~ delivery contract's named month.

[. . .]

CERTIFICATIONS PURSUANT TO SECTION 5c OF THE COMMODITY EXCHANGE  
ACT, 7 U.S.C. §7A-2 AND COMMODITY FUTURES TRADING COMMISSION RULE 40.6,  
17 C.F.R. §40.6

I hereby certify that:

- (1) The amended Rule as attached complies with the Commodity Exchange Act and the Commission's regulations thereunder; and
- (2) Concurrent with this submission, FMX Futures Exchange, L.P., posted on its website, <https://www.fmxfutures.com/rules-notice/>: (a) a notice of pending certification of this rule submission with the Commission; and (b) a copy of this submission.

*Rhianna Ross*

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By: Rhianna Ross  
Title: Chief Compliance Officer  
Date: May 5, 2025