



Via Portal Submission

December 30, 2025
MIA X Futures DCM Submission No. 25-50

Mr. Christopher Kirkpatrick
Secretary of the Commission
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street NW
Washington, DC 20581

RE: Rule Certification Submission Pursuant to Regulation 40.6(a)

Dear Mr. Kirkpatrick:

Pursuant to Commodity Exchange Act ("CEAct") Section 5c and Commodity Futures Trading Commission ("CFTC" or "Commission") Regulation 40.6(a), MIA X Futures Exchange, LLC ("MIA X Futures" or "Exchange") hereby certifies that the proposed amendments to the MIA X Futures Rules as set forth in Exhibit A comply with the CEAct and the Commission regulations promulgated thereunder ("Proposed Amendments"). MIA X Futures further certifies that the submission and pending changes to the MIA X Futures Rules have been posted on the Exchange website at the following link: <https://www.miaxglobal.com/markets/futures/miax-futures/rule-filings>.

Overview of Rule Amendments

The Proposed Amendments change the reportable position level in the Bloomberg 500 Index Futures contract, the Tini Bloomberg 500 Index Futures contract, and the Tini Bloomberg 100 Index Futures contract from 100 to 200 and provide clarifying language. These changes align with the reporting levels set forth in CFTC Regulation 15.03 for contracts based on broad-based security indexes. Trading in the contracts has not yet commenced, but when launched, all such positions will be reported in accordance with MIA X Futures Rule 2.3.5.

DCM Core Principles

MIA X Futures has reviewed the Core Principles for designated contract markets ("DCM Core Principles") and identified that the Proposed Amendments may impact the following DCM Core Principles:

- *DCM Core Principle 5 – Position Limitations or Accountability:* The Exchange is not changing position accountability levels. Rather, the Proposed Amendments change the reportable position level and are intended to comply with the requirements of this Core Principle and CFTC Regulation 15.03.
- *DCM Core Principle 7 – Availability of General Information:* The Proposed Amendments have been disseminated on the Company's website and will be available in the MIA X Futures Rulebook, which is accessible online.

Pursuant to MIA X Futures Bylaw 3.1., the Proposed Amendments were approved on December 29, 2025. There were no substantive opposing views expressed with respect to this filing. The Proposed Amendments are to be effective when incorporated into the MIA X Futures Rulebook and posted on its website, which will be at least 10 business days following the date of this submission.

MIA X FUTURES EXCHANGE, LLC

400 South 4th Street, 130 Grain Exchange Building | Minneapolis, MN 55415

MIA X Futures | [miaxglobal.com](https://www.miaxglobal.com)

If there are any questions regarding this submission, please contact me at (612) 321-7176 or jkrause@miaxglobal.com. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Krause', with a stylized, cursive script.

James D. Krause
Associate Counsel

EXHIBIT A

The following MIAX Futures Rules are to be amended. Additions are underlined while deletions are ~~strikethrough~~.

40.16. REPORTABLE POSITION AND TRADING VOLUME.

Pursuant to CFTC Regulation 15.03 and Part 17, any open position level in the B500 Futures Contract at the close of trading on any Trading Day equal to, or in excess of, ~~400~~200 contracts, long or short, in any one settlement month on either side of the market is required to be reported to the CFTC. All such positions will be reported to the Exchange in accordance with **Rule 2.3.5.** and in a manner and form as designated by the CFTC or the Exchange.

41.16. REPORTABLE POSITION AND TRADING VOLUME.

Pursuant to CFTC Regulation 15.03 and Part 17, any open position level in the Tini B500 Futures Contract at the close of trading on any Trading Day equal to, or in excess of, ~~400~~200 contracts, long or short, in any one settlement month on either side of the market is required to be reported to the CFTC. All such positions will be reported to the Exchange in accordance with **Rule 2.3.5.** and in a manner and form as designated by the CFTC or the Exchange.

42.16. REPORTABLE POSITION AND TRADING VOLUME.

Pursuant to CFTC Regulation 15.03 and Part 17, any open position level in the Tini B100 Futures Contract at the close of trading on any Trading Day equal to, or in excess of, ~~400~~200 contracts, long or short, in any one settlement month on either side of the market is required to be reported to the CFTC. All such positions will be reported to the Exchange in accordance with **Rule 2.3.5.** and in a manner and form as designated by the CFTC or the Exchange.