



Via Portal Submission

March 3, 2025
MIA Futures DCO Submission No. 25-06

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); Amendments to MIA Futures Risk Manual

Dear Secretary Kirkpatrick:

Pursuant to Commodity Exchange Act ("CEAct") Section 5c(c) and Commodity Futures Trading Commission ("CFTC") Regulation 40.6(a), MIA Futures Exchange, LLC ("MIA Futures" or "Exchange") hereby submits this self-certification of certain amendments to MIA Futures' Risk Management Principles Reference Manual ("Risk Manual"), attached hereto as Exhibit A. MIA Futures has respectfully requested confidential treatment for such amendments to the Risk Manual, which is being submitted concurrently with this submission. The Exchange intends to implement the amendments ten business days following the filing of this submission.

Overview of Amendments

MIA Futures has amended its Risk Manual, as shown in the attachment accompanying this submission, to make necessary updates and removals pertaining to the cessation of MIA Futures' clearing of Bitnomial Exchange products in February. In addition, changes to the Risk Manual include edits related to MIA Futures' change in legal entity name from the Minneapolis Grain Exchange, LLC to MIA Futures Exchange, LLC.

DCO Core Principles

In connection with updating its Risk Manual, the Exchange has reviewed the core principles for derivatives clearing organizations ("DCO Core Principles") and has determined that the amendments comply with the requirements of such principles. During the review, MIA Futures identified the following DCO Core Principle as potentially being impacted:

- *DCO Core Principle D – Risk Management:* CFTC Regulation 39.13 requires DCOs to possess certain risk management tools and procedures. These changes updating and removing language in the Risk Manual related to the termination of clearing Bitnomial products serve to update the Exchange's risk management tools and procedures, and as such, the amendments are consistent with the requirements of Core Principle D, CFTC Regulations 39.13 and 39.36.

MIA FUTURES EXCHANGE, LLC

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MIAX Futures hereby certifies that the amendments to its Risk Manual comply with the CEAct and the CFTC regulations promulgated thereunder. The Exchange is not aware of any substantive opposing views expressed regarding the amendments or this filing. MIAX Futures further certifies that, concurrent with this filing, a copy of the submission was posted on the Exchange website at the following link: <https://www.miaxglobal.com/markets/futures/miax-futures/rule-filings>. 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".

James D. Krause
Associate Counsel

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EXHIBIT A

MIAX FUTURES EXCHANGE, LLC

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