coinbase DERIVATIVES

January 30, 2025

<u>**VIA CFTC Electronic Portal**</u>

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

> **Re: CFTC Regulation 40.6(a) Certification: Modifications to Crypto Market Maker Program**
>
> **Coinbase Derivatives, LLC Submission #2025-04**

Dear Mr. Kirkpatrick:

Pursuant to Commodity Futures Trading Commission ("CFTC" or "Commission") Regulation 40.6(a), Coinbase Derivatives, LLC (the "Exchange") hereby submits for self-certification modifications to its Crypto Maker Maker Program (the "Program") filed with the Commission 2024-29 and most recently modified with the Commission as 2024-49**.** The terms and conditions of the modifications to this Program are set forth in Exhibit A, attached hereto, and will become effective on February 18, 2025.

<u>Compliance with Core Principles</u>

The Exchange has reviewed the designated contract market ("DCM") core principles ("Core Principles") set forth in the Commodity Exchange Act and the CFTC rules thereunder and has identified the following Core Principles that may be directly implicated by Program:

Core Principle 2 – Compliance with Rules and Core Principle 4 – Prevention of Market Disruption

All trading on the Exchange, including any trading and related activity by Participants under the Program, is subject to the Exchange Rulebook (the "Rulebook") including Chapter 5, which prohibits fraud, non-competitive trading, market manipulation and abusive and disruptive trade practices. Capitalized terms not otherwise defined herein are defined in the Rulebook. Additionally, as with all trading on the Exchange, trading in the Program's products will be subject to monitoring and surveillance by the Market Regulation Department, which has the authority to investigate and enforce Exchange rules, as described in Chapter 7.

Core Principle 9 – Execution of Transactions

The Program's products are listed for trading on the Exchange's trading system, which provides for efficient, competitive, and open execution of transactions pursuant to the Exchange Rulebook.

Core Principle 12 – Protection of Markets and Market Participants

Chapters 4 and 5 of the Rulebook require all Participants, including those participating in the Program, to observe high standards of integrity, market conduct, commercial honor, fair dealing, and just and equitable principles of trade and prohibits, among other things, fraud, non-competitive trading, market manipulation, and abusive and disruptive trade practices. As with all contracts traded on the Exchange, trading in the Program's products will be subject to monitoring and surveillance by the Market Regulation Department and compliance with the Program will be monitored and enforced by the Exchange.

Core Principle 18 – Recordkeeping

Records related to the Program will be maintained by the Exchange in compliance with its recordkeeping policies and the requirements of the Commodity Exchange Act and CFTC Rules.

Certification

The Exchange is not aware of any substantive opposing views to the Program. The Exchange certifies that the Program complies with the Commodity Exchange Act and the rules and regulations promulgated thereunder.

The Exchange certifies that this submission has been concurrently posted on the Exchange's website at: https://www.coinbase.com/derivatives/filings.

If you have any questions or require further information, please contact the undersigned at jane.downey@coinbase.com.

Sincerely,

/s/ Jane Downey
Chief Regulatory Officer

Attachment: Appendix A

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APPENDIX A

Crypto Market Maker Program

(additions underlined; deletions ~~stricken-through~~)

Program Purpose

The purpose of the Crypto Market Maker Program (the "Program") is to support the development of the Exchange's products by increasing liquidity in the Exchange's central limit order book and, therefore, benefit all Participants in the market.

Product Scope

Bitcoin Futures (BTI), Ether Futures (ETI), nano Bitcoin Futures (BIT), nano Ether Futures (ET), Bitcoin Cash Futures (BCH), Litecoin Futures (LC), Dogecoin Futures (DOG), Avalanche Futures (AVA), Polkadot Futures (DOT), Chainlink Futures (LNK), 1k Shib Futures (SHB), ~~and~~ Stellar Futures (XLM), Hedera (HED), nano Solana (SOL), and Solana (SLC)[1].

Eligible Participants

Those who (i) agree to make two-sided markets according to the Program's quoting requirements and (ii) complete and submit the application shall be deemed "Eligible Participants". Eligible Participants who subsequently receive approval by the Exchange to enter and participate in the Program shall be deemed "Program Participants". The Exchange, in its sole discretion, reserves the right to deny Program entry to new Eligible Participants based on factors such as, but not limited to, current market dynamics and total number of program participants, and may place new Eligible Participants on a waitlist indefinitely or until one or more current Program Participants drop out or in the event the Exchange deems it necessary to add additional Program Participants, in its sole discretion.

Program Participants who begin quoting and/or trading on or before the fifteenth calendar day of a given month shall be deemed eligible to participate in the Program's obligations and incentives in that same month. Conversely, Program Participants who begin quoting and/or trading after the fifteenth calendar day, shall not be eligible to participate in the Program's obligations and incentives until the first business day of the following month, at the earliest.

Program Term

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[1] The Exchange intends to file these new contracts in accordance with 17 CFR 40.2 prior to the proposed modifications coming into effect.

The Program becomes effective on July 1, 2024 and ends on <u>March 31</u>~~February 28~~, 2025.

Obligations

[REDACTED]

Monitoring and Termination of Status

The Exchange will monitor each Program Participant's trading activity and performance and retains the right to revoke the status of a given Program Participant if it determines in its sole discretion that a Program Participant failed to meet the obligations of the Program.