

# coinbase DERIVATIVES

February 11, 2025

## **VIA CFTC Electronic Portal**

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 Retail Broker Program  
Coinbase Derivatives, LLC Submission #2025-05**

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 Retail Broker Program (the “Program”) previously filed with the CFTC as submission 2024-50. The terms and conditions of the Program are set forth in Exhibit A, attached hereto, and will become effective on March 1, 2025.

### **Compliance with Core Principles**

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.

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## *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](mailto:jane.downey@coinbase.com).

Sincerely,

/s/ Jane Downey  
Chief Regulatory Officer

Attachment: Appendix A

## APPENDIX A

### Retail Broker Program

(additional underlined; deletions ~~stricken through~~)

#### Program Purpose

The purpose of the Retail Broker 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.

#### Eligible Products

Eligible products include those (i) currently listed for trading and (ii) any other subsequent futures products listed for trading (the “Products”).

#### Eligible Participants

The Program is open to any CFTC-registered futures commission merchant (FCM) or introducing broker (IB) (collectively, the “Participant”) who (i) has direct Non-Professional and Professional Traders, as defined in the Exchange’s Rules (“TradersNon-Professional”); (ii) completes and submits (or has completed and submitted) an application and the Retail Broker Program Agreement; and (iii) makes all Bitcoin and Ether futures (BTI, ETI, BIT, ET) available to its customers. All Participants who submit an application are subject to review and approval by the Exchange’s onboarding team.

#### Program Term

The Program becomes effective on July 1, 2024 and ends on October 31, 2025.

#### Obligation

[REDACTED]

#### Incentives

[REDACTED]

#### Monitoring and Termination of Status

The Exchange will monitor all trading activity and Participant’s performance, and shall retain the right to suspend or remove any Participant from the Program at any time prior to the end of the initial term, at its sole discretion.