



Memorandum

TO: Members and Member Firms

FROM: Market Regulation Department

DATE: July 13, 2020

SUBJECT: **Use of Cloud9 Technologies in the Trading Pits**

In connection with the reopening of the Eurodollar options pit on August 10, 2020, CME and CBOT are amending Rule 506 (“Headset Privileges on the Trading Floor”) to permit members and member firms and their employees to use third-party headset providers in the trading pits to communicate with on- and off-floor locations, provided that the third-party service provider has been approved by the Exchange pursuant to Rule 507 (“Electronic Devices”).

The voice communication platform offered by Cloud9 Technologies (“Cloud9”) was previously approved for use in booths on the trading floor, and has now been approved as an alternative to Exchange-issued headsets for use in and around the trading pits. Usage of the Cloud9 platform in the pit will require that members and member firms agree to 1) record all voice communications pursuant to the existing requirements of Rule 506, and 2) provide the CME Group Market Regulation Department (“Market Regulation”) with administrative rights to their Cloud9 account on the Cloud9 portal for purposes of accessing call records and voice recordings.

Any member or member firm interested in using Cloud9 in a trading pit must identify each individual who will use Cloud9 in the trading pit by providing that information on this form. Once completed, a copy of this form (PDF or JPEG) must be sent to Market Regulation via email at Cloud9agreement@cmegroup.com.

For member firms, this form must be signed by an authorized representative of the member firm. For members not employed by a member firm, each member must complete and sign this form.

Once this form has been received, Market Regulation will notify Cloud9 that the member or member firm has signed the agreement, and the Cloud9 onboarding process may proceed. Cloud9 will then work with the member or member firm to coordinate service provisioning, inclusive of providing the Market Regulation Department the required administrative access rights to their account.

Additional information on Cloud9 is available on the firm’s website at <https://www.c9tec.com>. Alternatively, you may contact Tim Walsh at Cloud9 at tim.walsh@c9tec.com 312.560.9222. If you have any questions concerning the regulatory requirements of using Cloud9 technology in the pit, please email Cloud9agreement@cmegroup.com.

List of Users of Cloud9 in the pit:

_____ User Name	_____ Member (M) or Non-Member Employee (NME)	_____ Acronym if Member (M)
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_____ User Name	_____ Member (M) or Non-Member Employee (NME)	_____ Acronym if Member (M)
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_____ User Name	_____ Member (M) or Non-Member Employee (NME)	_____ Acronym if Member (M)
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_____ Signature of Member or Member Firm Representative	_____ Contact Phone Number
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Print Name of Member or Member Firm Representative

Name of Member Firm, where applicable

Date