Timothy Elliott
Managing Director and Chief Regulatory Counsel
Legal Department

March 4, 2025

VIA ELECTRONIC PORTAL

Christopher J. Kirkpatrick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

RE: Implementation of the Southern Yellow Pine Market Maker Program
CME Submission No. 25-115

Dear Mr. Kirkpatrick:

Chicago Mercantile Exchange Inc. ("CME" or "Exchange") hereby notifies the Commodity Futures Trading Commission ("CFTC" or "Commission") of plans to implement the Southern Yellow Pine Market Maker Program ("Program"). The proposed Program will become effective on April 1, 2025.

Exhibit 1 sets forth the terms of this Program.

CME reviewed the designated contract market core principles ("Core Principles") as set forth in the Commodity Exchange Act ("CEA"). During the review, CME staff identified the following Core Principles as potentially being impacted: Monitoring of Trading, Execution of Transactions, Protection of Market Participants, Compliance with Rules, Availability of General Information, and Recordkeeping.

The Program will not impact the Exchange's ability to perform its trade practice and market surveillance obligations under the CEA and the Exchange's market regulation staff will monitor trading in the Program's products to prevent manipulative trading and market abuse. Additionally, the Exchange has implemented systems to track Program participants' obligations to ensure proper distribution of earned incentives. The incentives in the Program do not impact the Exchange's order execution. Participants in the Program will be selected by Exchange staff using criteria as further stated in Exhibit 1. Chapter 4 of the CME rules includes prohibitions against fraudulent, non-competitive, unfair or abusive practices. All participants must execute a contractual agreement with the Exchange in which each participant will expressly agree to comply with and be subject to, applicable regulations and CME rules. The Program is subject to the Exchange's record retention policies which comply with the CEA.

CME certifies that the Program complies with the CEA and the regulations thereunder. There were no substantive opposing views to this Program.

The Exchange certifies that this submission has been concurrently posted on the Exchange's website at http://www.cmegroup.com/market-regulation/rule-filings.html.

If you require any additional information regarding this submission, please e-mail CMEGSubmissionInquiry@cmegroup.com or contact Rachel Johnson at 312-466-4393 or via e-mail at Rachel.Johnson@cmegroup.com.

Sincerely,

/s/ Timothy Elliott
Managing Director and Chief Regulatory Counsel

Attachment: Exhibit 1

EXHIBIT 1

Southern Yellow Pine Market Maker Program

Program Purpose

The purpose of this Program is to encourage participants to support the launch and development of the product listed below. A more liquid contract on the central limit order book benefits all participants in the marketplace.

Product Scope

Agricultural Lumber Southern Yellow Pine Futures ("SYP") that are traded on the CME Globex Platform ("Product").

Eligible Participants

There is no limit to the number of participants that may enroll in the Program. Participants may be CME members or non-members.

Program Term

Start date is April 1, 2025. End date is September 30, 2025, or the date on which the Exchange determines to modify, extend, or terminate the Program. Participants will be given notice of any changes to the Program Term.

Hours

Designated hours between 8:30AM – 3:00PM CT.

Obligations

Minimum Quoting Obligations: In order to be eligible to receive incentives, participants must quote continuous two-sided markets in the Product at maximum widths and minimum sizes during a specified percentage of time-in-market, in accordance with the baseline quoting obligations listed in the table below. Notwithstanding the foregoing, the Exchange may vary the baseline quoting obligations as they deem necessary based on ongoing evaluations of the Program.

<table>
<tr><th>Ticker</th><th>Product</th><th>Width (Minimum Price Increment "MPI")</th><th>Size (Contracts)</th><th>Time-in-Market ("TIM")</th><th>Time Period (CT)</th></tr>
<tr><td rowspan="4">SYP</td><td>Month 1</td><td>2</td><td>2</td><td>75%</td><td rowspan="3">8:30AM – 3:00PM</td></tr>
<tr><td>Month 2</td><td>4</td><td>2</td><td>75%</td></tr>
<tr><td>Month 3</td><td>6</td><td>1</td><td>75%</td></tr>
<tr><td>Month 1 – Close</td><td>2</td><td>1</td><td>50%</td><td></td></tr>
</table>

	Month 2 – Close	4	1	50%	2:55PM – 3:00PM
	Month 3 – Close	6	1	50%	

Holiday Quoting Schedule: There will be no quoting obligations on certain dates designated by the Exchange. Participants will be given notice of the Holiday Quoting Schedule.

Incentives

Fee Waivers: Upon meeting the Month 1 Minimum Quoting Obligations, as determined by the Exchange, participants will receive Globex fee waivers in the Product.

Monthly Stipend: Upon meeting all Minimum Quoting Obligations, as determined by the Exchange, participants will be eligible for the Monthly Stipend. Each month, all eligible participants will be ranked by passive Globex volume in the Product. The top four (4) participants will receive a stipend of $3,000. In the event of a tie, the greatest overall TIM will determine eligibility.

Fee Credits: Upon meeting all Minimum Quoting Obligations, as determined by the Exchange, participants will receive a fee credit of $1 per side on all passive Globex volume, capped at $4,000 per participant, per month.

Monitoring and Termination of Status

The Exchange shall retain the right to revoke participant status if it concludes from review that a participant no longer meets the requirements of the Program.

If the Exchange determines that a participant has not met its quoting obligations during any one (1) calendar month over the proposed duration of the Program but is within twenty percent (20%) of the time-in-market obligations, the participant will be eligible to receive the incentives for that applicable month.

Excluding the aforementioned relaxed time-in-market leniency, if the Exchange determines that a participant has not met its quoting obligations during any one (1) calendar month, the participant will be eligible to receive incentives for that applicable month, with the exception of the Monthly Stipend.

Upon utilizing the leniencies set forth above, participants that fail to meet quoting obligations in any additional month may be removed from the Program.