

February 27, 2014

To: Brokers and Associated Persons

From: John J. Wawro

RE: New Market Data Policy

Beginning March 1, 2014, the CME will eliminate the current fee waiver for all trading platforms for all new users but all existing users will have the fee waiver extended until January 2015. All current subscribers will be categorized as a Professional user for the remainder of 2014 and no changes will need to be made. The new fee policy will require each customer or broker to identify in writing what exchanges they want to receive live data from and at what levels.

Below is a description of the different classes of market data subscribers and the breakdown per exchange that the CME intends to charge the end users.

Non-Professional Subscriber is a user who is not associated with any agency that is registered with futures or securities agency. These are primarily single users that trade for themselves and can either be hedgers or speculators. Most retail users will fit into this category. These are users who trade for themselves and do not benefit from being a member of an exchange, FCM, or professional organization.

The exchange will offer two types of licensing options which are Top of Book and Market Depth. These users can choose either license. Top of Book Licenses (Best Bid/Ask Only) are available for individual markets or they can bundle (all exchanges) for \$3.00 per month. Market Depth Licenses will also have the option of getting individual data for \$5.00 per each exchange or \$15.00 for all four. The subscriber will have to complete and fill out the Non-Professional Subscriber declaration form and we will need to maintain the copy on file.

Non Professional Subscriber	CME	CBOT	NYMEX	COMEX	Bundle
Top of Book	\$1.00	\$1.00	\$1.00	\$1.00	\$3.00
Market Depth	\$5.00	\$5.00	\$5.00	\$5.00	\$15.00

Please note that all users are grandfathered in by the CME as a Professional user. Customers or traders that want to have Non-Professional rates will need to complete and submit Schedule 4 Exhibit A by December 31, 2014 in order to receive the reduced rates for 2015.

Professional Subscriber is where most of the impact of the fee schedule will occur. The Subscriber will be considered a Professional and therefore subject to the new fee structure if he meets the following criteria

- A) They are registered with any professional or government agency including NFA, SEC, CFTC, etc.
- B) They are engaged as a “investment advisor” defined in Section 201(11) of the Investment Advisor’s Act of 1940 whether or not registered or qualified under the Act
- C) They are employed by a bank or other organization that is not exempt from registration under Federal and State securities laws

- D) They must also be able to access the data via device capable of routing orders to CME GLOBEX
- E) The subscriber does not hold or lease any type of memberships at any of the CME Group's DCMs.

For the Professional subscriber, there are two tiers of charges. If the Professional is new to trading, he will fall under the Standard Market Data package. If the Professional is a current user and is grandfathered in, he will be eligible for the Reduced Rate Market Data package. Currently, the reduced rates will only apply for the 2015 year. This level does not have a reduced bundle rate if the subscriber elects to choose all 4 exchanges.

Professional Subscriber	CME	CBOT	NYMEX	COMEX	TOTAL
Standard Market Data	\$85.00	\$85.00	\$85.00	\$85.00	\$340.00
Reduced Rate Market Data	\$42.50	\$42.50	\$42.50	\$42.50	\$170.00

Non-Display Subscriber will have three types of users assigned to this designation. There will be no users grandfathered in or reduced rates for these subscribers.

- 1) These are subscribers who access, process, or consume Market Data other than support
 - A) Automated Trading System subscribers are those users trade via an ATS system.
 - B) Trade Internalization Subscribers use market data in systems that match trades within an organization as opposed to routing to the exchange.
 - C) Internal Non-Display Subscribers use the market data for Risk management, portfolio management and trade monitoring.

Non-Display Subscriber	CME	CBOT	NYMEX	COMEX	TOTAL
Category A	\$670.00	\$670.00	\$670.00	\$670.00	\$2,680.00
Category B	\$670.00	\$670.00	\$670.00	\$670.00	\$2,680.00
Category C	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

The customer will not be billed from the exchange direct. Our trading partners will bill us directly through their normal monthly billing procedures and we will debit the customer account at Straits. The exchanges will be 30 days in arrears which means that account cannot be fully closed out until we have confirmed what if any charges will be incurred from the exchange.

The *Trading Waiver Subscriber Migration Request Form* will be required and will need to be submitted to the FCM when a user migrates from one platform to another as well as one FCM to another. The form will need to be filled out and signed by the end user in order to begin trading. If it is not, the exchange may charge the end user the price of the subscription and not allow any appeals.

In addition, the CME will begin charging market data fees for CME DIRECT, EOS, and CLEARPORT where applicable. There will be no fee waiver given for this product.

If you have any additional questions, please contact ETS at (312) 670-2822 or at ETS@straitfinancial.com.