November 4, 2026

SUBMITTED VIA CFTC PORTAL
Secretary of the Commission
Office of the Secretariat
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: KalshiEX LLC — Security Futures Product Rule Submission: Self-Certification of Amendments to Rule 14.3 (Initial Listing Eligibility Criteria) of Chapter 14 of the Exchange Rulebook Pursuant to CFTC Regulations 40.6 and 41.24

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c) of the Commodity Exchange Act ("CEA") and Commodity Futures Trading Commission ("CFTC" or "Commission") Regulations 40.6 and 41.24, KalshiEX LLC (the "Exchange") hereby submits for self-certification amendments (the "Amendments") to Rule 14.3 (Initial Listing Eligibility Criteria) of Chapter 14 (Security Futures Products) of the Exchange Rulebook (the "Rules"). The Amendments permit the Exchange to list a Perpetual Security Futures Product ("Perpetual SFP") on an Underlying Security that has recently completed a large initial public offering, on the timetable and under the quantitative standards that the national securities exchanges that trade options apply to newly public securities. The Exchange intends to implement the Amendments on November 19, 2026, which is not earlier than ten business days following the Commission's receipt of this submission. The text of the Amendments, with additions indicated, is attached as Exhibit A.

I. Background

The Exchange is a CFTC-registered designated contract market ("DCM"). The Exchange is notice-registered with the Securities and Exchange Commission ("SEC") as a national securities exchange pursuant to Section 6(g) of the Securities Exchange Act of 1934, as amended (the "Exchange Act"), for the limited purpose of trading security futures products, and its Form 1-N became effective on September 3, 2026.

On September 18, 2026, the Exchange submitted Chapter 14 to the Commission pursuant to Regulations 40.5 and 41.24, together with a request for approval of the Perpetual SFP contract pursuant to Regulations 40.3 and 41.23(b) (together, the "Launch Submissions"), and filed Chapter 14 with the SEC on Form 19b-7 pursuant to Section 19(b)(7) of the Exchange Act. Part II of Chapter 14 sets out the listing standards for Underlying Securities, including the initial listing eligibility criteria of Rule 14.3.

Two of the Rule 14.3 criteria are written on the assumption that an Underlying Security has a trading history over a certain lookback period. Rule 14.3(c) requires an average daily value of transactions ("ADTV") of at least $450,000,000 over the six months preceding the New Product Committee's ("NPC") review or, for a security listed for trading for less than six months, an

ADTV of at least $1,000,000,000 “over the prior month.” Rule 14.3(d) requires a closing price of at least $3.00 for “covered securities” on each of the five consecutive business days preceding the date on which the Exchange commences to list the Perpetual SFP. A security that has recently completed an initial public offering cannot satisfy these provisions as written until it has been traded for at least one month, however large its market capitalization and however actively it trades.

The national securities exchanges that trade options (the “options exchanges”) have adopted rule changes expressly designed to address the same issue. In 2023 the SEC approved an amendment to NYSE American Rule 915, Commentary .01 permitting options on a security having a market capitalization of at least $3 billion, based upon the offering price of its initial public offering, to be listed and traded on or after the second business day following the initial public offering day, and the other options exchanges adopted substantively identical provisions. See Securities Exchange Act Release No. 98013 (July 27, 2023), 88 FR 50927 (Aug. 2, 2023) (SR-NYSEAMER-2023-27); Securities Exchange Act Release No. 98277 (Sept. 1, 2023) (SR-CBOE-2023-043) (Cboe Rule 4.3, Interpretation and Policy .01(b)(2)(A)(ii)). The options exchanges’ trading-volume guideline—at least 2,400,000 shares traded, in all markets, in the preceding twelve months—is not framed as an ADTV requirement, and does not specify any minimum lookback period. With several large initial public offerings anticipated in the coming months, the Exchange expects substantial demand from market participants for Perpetual SFPs on those securities promptly after they begin trading. The Amendments would revise Rule 14.3 in a manner consistent with options exchanges’ listing standards to address this market demand, subject to the relevant securities having a market capitalization of at least $3 billion based on the initial public offering’s offering price and satisfying all of the listing standards in Part II of Chapter 14 (which would remain unchanged except as described herein).

Pursuant to Regulation 41.24(a)(3), the Exchange certifies that it has filed the Amendments with the SEC on Form 19b-7 by filing dated November 4, 2026, in accordance with Section 19(b)(7) of the Exchange Act and Rule 19b-7 thereunder. The Amendments relate to listing standards for security futures products within the meaning of Section 19(b)(7)(A) of the Exchange Act and, consistent with Section 19(b)(7)(B), are effective upon filing with the SEC, subject to the SEC’s authority under Section 19(b)(7)(C) to abrogate the rule change within 60 days.

II. Description of the Amendments

The Amendments add one definition to the introductory paragraph of Rule 14.3 and modify two of the criteria set forth in that Rule. No other provision of the Rules is affected.

Rule 14.3 (introductory paragraph). A new sentence defines an Underlying Security’s “initial public offering day” as the first day on which the Underlying Security trades “regular way” on a national securities exchange. The term is used in amended Rules 14.3(c) and 14.3(d).

Rule 14.3(c) (Trading Volume). The exception for Underlying Securities listed for trading for less than six months is divided into two clauses. Clause (i) carries forward the existing requirement of an ADTV of not less than $1,000,000,000 over the prior month without change. New clause (ii) provides that an Underlying Security listed for trading for less than one month must instead have had a trading volume, in all markets in which it is traded, of at least 2,400,000 shares since its initial public offering day. The 2,400,000-share standard is the trading-volume guideline the options exchanges apply to every underlying security (see, e.g., Cboe Rule 4.3,

Interpretation and Policy .01(b)). The $450,000,000 six-month ADTV requirement for Underlying Securities with the requisite trading history is unchanged.

Rule 14.3(d) (Share Price). A proviso is added to the requirement applicable to "covered securities." The requirement that the closing price have been at least $3.00 on each of the five consecutive business days preceding listing is waived during the three business days following the initial public offering day of an Underlying Security having a market capitalization of at least $3,000,000,000 based upon the offering price of its initial public offering, in which case the Exchange may commence to list and trade the Perpetual SFP on that Underlying Security on or after the second business day following its initial public offering day. The five-business-day lookback itself, and the $7.50 requirement for securities that are not covered securities, are unchanged. The proviso tracks NYSE American Rule 915, Commentary .01 and Cboe Rule 4.3, Interpretation and Policy .01(b)(2)(A)(ii).

Every other initial listing criterion in Rule 14.3 continues to apply to a newly public Underlying Security without modification, including the $100,000,000,000 market capitalization requirement of Rule 14.3(b), the Public Float and Estimated Deliverable Supply requirements of Rules 14.3(e) and 14.3(f), the reporting-status requirement of Rule 14.3(g) and the 2,000-holder requirement of Rule 14.3(j), as do the categorical exclusions of Rule 14.4 and the NPC review required by Rule 14.8. Because Rules 14.3(b) is measured as of the trading day preceding the NPC's review, the NPC cannot act on a newly public Underlying Security before its first closing price is available, and the Exchange cannot list a Perpetual SFP on it before the second business day following its initial public offering day.

III. Explanation and Analysis

Pursuant to Regulation 40.6(a)(7)(v), the Exchange provides the following concise explanation and analysis of the operation, purpose and effect of the Amendments and of their compliance with the CEA, including the Core Principles, and the Commission's regulations thereunder.

In operation, the NPC will review a newly public Underlying Security against every criterion of Rule 14.3 using its first day or days of consolidated trading data. If the NPC approves the listing, the Exchange will make the product filing required by Regulation 41.23 and may list the Perpetual SFP on or after the second business day following the initial public offering day. During the three business days following the initial public offering day the Rule 14.3(d) price requirement is waived; thereafter it applies as currently written.

The purpose of the Amendments is to allow Perpetual SFPs on the largest newly public companies to come to market on the same timetable as exchange-traded options on those companies. In approving the options exchanges' provision, the SEC relied on NYSE American's review of initial public offerings dating back to 2017, which found that 202 of the 1,179 offerings between January 1, 2017 and October 21, 2022 met the $3 billion threshold and that none of those 202 securities closed below $3.00 per share during its first three days of trading. See Securities Exchange Act Release No. 98277, at 5. The Exchange's $100 billion market capitalization requirement confines the Amendments in practice to a small number of very large offerings whose securities trade many multiples of the 2,400,000-share threshold on their first day.

Section 2(a)(1)(D)(i) of the CEA and Section 6(h)(3)(C) of the Exchange Act require the Exchange's listing standards for security futures products to be no less restrictive than

comparable listing standards for options traded on a national securities exchange. The Amendments are consistent with this requirement. Amended Rule 14.3(c)(ii) adopts the options exchanges' own trading-volume guideline for securities in their first month of trading, while the ADTV requirements applicable to all other Underlying Securities, which are far more stringent than the options guideline, are unchanged. The added proviso to Rule 14.3(d) is equivalent to rule changes adopted by the options exchanges, and outside the waiver period the Exchange's five-business-day price lookback remains more stringent than the options exchanges' three-business-day lookback. The requirements of Regulation 41.21 applicable to Underlying Securities are unaffected and continue to apply in full.

The Amendments are prospective and confined to the initial listing eligibility criteria for Perpetual SFPs. They do not change the maintenance standards of Rule 14.6 or the margin, position limit, trading halt, surveillance or sales-practice provisions of Chapter 14; they do not alter the terms of any Perpetual SFP listed or approved for listing as of the date of this submission; and they do not affect any other contract listed on the Exchange. Consistent with Regulation 40.6(a)(2), the Exchange has posted a notice of pending certification and a copy of this submission on its website concurrently with this filing.

IV. Certification Pursuant to CFTC Regulation 41.24

Pursuant to Regulation 41.24(a), the Exchange certifies that this submission satisfies the elements specified in Regulation 41.24(a)(1) through (5): (1) this submission is labeled "Security Futures Product Rule Submission"; (2) it includes a copy of the amended rule, attached hereto as Exhibit A; (3) it includes the certification, set forth in Section I above, that the Exchange has filed the Amendments with the SEC in accordance with Section 19(b)(7) of the Exchange Act and Rule 19b-7 thereunder; (4) it includes the documents and certifications required under Regulation 40.6, including the certification that the Perpetual SFP, as listed under the amended standards, complies with the CEA and the Commission's regulations thereunder; and (5) it includes the submission cover sheet prepared in accordance with the instructions in Appendix D to Part 40.

The Exchange further certifies that the Amendments do not affect the certifications required by Regulation 41.22 that accompanied the Launch Submissions. Specifically:

- The amended listing standards remain consistent with Regulation 41.21 and support the certification required by Regulation 41.22(a) (see Exhibit A, Rule 14.3);
- Trading in Perpetual SFPs on Underlying Securities listed under the amended standards is not readily susceptible to manipulation of the price of the Perpetual SFP, nor to causing or being used in the manipulation of the price of any Underlying Security or option thereon, consistent with Regulation 41.22(f) and the conditions for trading of Regulation 41.25, for the reasons discussed under Core Principle 3 below;
- The provisions supporting the certifications required by Regulations 41.22(d), (e), (g), (h), (i) and (j) are unchanged from the Launch Submission, including the coordinated trading halts of Rule 14.13 (Regulation 41.25(b)(2)), the speculative position limits and position accountability levels of Rules 14.23–14.24 (Regulation 41.25(b)(3)), the customer margin requirements of Rules 14.16–14.22 (Regulations 41.42–41.49) and the coordinated surveillance and audit trail provisions of Rules 14.34–14.36; and
- Because Perpetual SFPs are cash-settled, Regulation 41.22(b) remains inapplicable.

V. Compliance with DCM Core Principles

Under Section 5(d)(1)(B) of the CEA and Regulation 38.100(b), the Exchange has reasonable discretion in establishing the manner in which it complies with the Core Principles. The Exchange has reviewed the Amendments against all twenty-three DCM Core Principles and addresses below those they implicate. The Exchange certifies that the Amendments comply with the CEA and the Commission's regulations thereunder.

Core Principle 3—Contracts Not Readily Susceptible to Manipulation. The Amendments shorten the trading history required of an Underlying Security without reducing the size and liquidity it must have. A newly public Underlying Security remains subject to the $100 billion market capitalization requirement, the 20 million-share Estimated Deliverable Supply requirement, the 7 million-share Public Float requirement and the 2,000-holder requirement, and the NPC must evaluate its susceptibility to manipulation under Rule 14.8(b) before approving a listing. Securities that meet these criteria in their first days of trading are among the most actively traded in the U.S. equity market; their prices are formed on a national securities exchange, disseminated through the consolidated tape and surveilled by the listing exchange, FINRA and the members of the Intermarket Surveillance Group, of which the Exchange is a member. The options exchanges list options on such securities on the same timetable, and the SEC concluded in approving their provision that doing so is consistent with the protection of investors. The Funding Rate and Mark Price methodologies, trading safeguards, position limits (which apply from the first day of listing), surveillance program and insider-trading restrictions described in the Launch Submissions apply to a Perpetual SFP on a newly public Underlying Security exactly as they apply to every other Perpetual SFP.

Core Principle 4—Prevention of Market Disruption. The Exchange's real-time surveillance, audit trail and risk controls under Parts IV and IX of Chapter 14 and Regulations 38.250–38.258 are unchanged. The coordinated trading halts of Rule 14.13 apply to a Perpetual SFP on a newly public Underlying Security from its first day of listing, so that a regulatory halt in the Underlying Security is coordinated across the cash, options and Perpetual SFP markets in the same manner as for any other Underlying Security.

Core Principle 7—Availability of General Information. Amended Rule 14.3 will be posted on the Exchange's website consistent with Regulation 38.401(a)(3) and (d), and this submission was posted concurrently with filing consistent with Regulation 38.401(c)(1).

Core Principle 12—Protection of Markets and Market Participants. The Amendments do not alter the risk-disclosure, suitability or sales-practice requirements of Part VIII of Chapter 14. By allowing Perpetual SFPs on large newly public companies to be listed when options on those companies become available, the Amendments give market participants a regulated, centrally cleared means of hedging or obtaining exposure to such securities during the period immediately following an initial public offering.

Other Core Principles. The Amendments do not impair the Exchange's ongoing compliance with the remaining Core Principles, the CEA or the Commission's regulations thereunder. Consistent with Regulation 40.6(a)(7)(vi), no substantive opposing views were expressed by the Exchange's Board of Directors, Members or market participants that were not incorporated into the Amendments, and the Exchange has not received any objections from Members regarding the Amendments.

VI. Exhibits

The following exhibit is attached hereto:

Exhibit A — Amendments to Rule 14.3 (Initial Listing Eligibility Criteria) of the KalshiEX LLC Rulebook, Chapter 14 (Security Futures Products), with additions indicated

VII. Conclusion

The Exchange respectfully submits the Amendments for self-certification pursuant to CFTC Regulations 40.6 and 41.24. The Exchange believes that the Amendments are consistent with the requirements of the CEA, the Securities Exchange Act of 1934 and the joint CFTC-SEC regulatory framework for security futures products, and that they conform the Exchange's initial listing eligibility criteria for newly public Underlying Securities to the standards applied by the options exchanges without diminishing the protections of Chapter 14.

Should you or the staff have any questions regarding this submission, please contact me at your earliest convenience.

Respectfully submitted,



Xavier Sottile

Head of Markets

KalshiEX LLC

Exhibit A

Amendments to Rule 14.3 of the KalshiEX LLC Rulebook — Chapter 14 (Security Futures Products)

PART II — LISTING STANDARDS AND PRODUCT ELIGIBILITY

Rule 14.3 Initial Listing Eligibility Criteria

An Underlying Security must satisfy all of the following criteria at the time of initial listing to be eligible for a Perpetual SFP on the Exchange. For purposes of this Rule 14.3, the "initial public offering day" of an Underlying Security is the first day on which the Underlying Security trades 'regular way' on a national securities exchange.

(a) – (b) No change.

(c) **Trading Volume.** The Underlying Security must have an ADTV of not less than $450,000,000 over the six months immediately preceding the NPC's review, except (i) where the Underlying Security has been listed for trading for less than six months, in which case the Underlying Security must have an ADTV of not less than $1,000,000,000 over the prior month or (ii) where the Underlying Security has been listed for trading for less than one month, in which case the Underlying Security must have had a trading volume (in all markets in which it is traded) of at least 2,400,000 shares since its initial public offering day. In computing ADTV, the Exchange shall use consolidated price data from the relevant Securities Information Processor.

(d) **Share Price.** If the Underlying Security is a "covered security" as defined under Section 18(b)(1)(A) of the Securities Act of 1933, the closing price of the Underlying Security has been at least $3.00 for the previous five consecutive business days preceding the date on which the Exchange commences to list and trade the Perpetual SFP contract on such Underlying Security; provided, however, that the foregoing requirement shall be waived during the three business days following the initial public offering day of an Underlying Security having a market capitalization of at least $3,000,000,000 based upon the offering price of its initial public offering, in which case the Exchange may commence to list and trade the Perpetual SFP on such Underlying Security on or after the second business day following its initial public offering day. If the Underlying Security is not a "covered security" as defined under Section 18(b)(1)(A) of the Securities Act of 1933, the closing price of the Underlying Security has been at least $7.50 for the previous five consecutive business days preceding the date on which the Exchange commences to list and trade the Perpetual SFP contract on such Underlying Security.

(e) – (m) No change.