

October 5, 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: Notice of Scheduled Maintenance Window Impacting Trading Hours for Event Contracts

Dear Sir or Madam,

ProphetX LLC (“ProphetX” or the “Exchange”) hereby notifies the Commodity Futures Trading Commission (“CFTC”) that it is self-certifying, pursuant to Section 5c of the Commodity Exchange Act (“CEA”), CFTC Regulation 40.6(a), ProphetX Rule 4.8, and ProphetX Rule 2.8 (Emergency Authority), a temporary emergency change in event contract trading hours to accommodate one scheduled maintenance windows, effective October 6, 2026.

ProphetX Rule 4.8 (Hours of Operation) provides that “Market Participants may place Orders at all times outside of maintenance windows,” that trading on the Platform will generally be available twenty-four (24) hours per day, seven (7) days per week except during scheduled maintenance windows, Emergency actions taken pursuant to Rule 2.8, or other periods where trading is suspended, halted, or limited pursuant to the Rules or Applicable Law, and that maintenance windows will be announced in advance by the Exchange, with such announcements published on the Exchange’s website. ProphetX Rule 2.8 (Emergency Authority) authorizes the Exchange to take any action reasonably necessary or appropriate to maintain or restore orderly trading during an Emergency, including modifying trading hours. This filing provides notice that, in accordance with Rules 4.8 and 2.8, ProphetX has scheduled a maintenance window that will temporarily affect trading availability on the Exchange in order to conduct maintenance to support trading in certain markets. This maintenance window has been announced in advance and posted on the Exchange’s website. As a result, trading of event contracts will not be available on ProphetX during the following times:

- Wednesday, October 7, 2026, between 2:00 AM and 4:00 AM ET

In accordance with Rule 4.8, trading will be available at all times outside of posted maintenance windows. Consistent with Rule 2.8 and CFTC Regulation 40.6, the Exchange is providing this notice to the CFTC in advance of the maintenance window.

Compliance with Core Principles

ProphetX has concluded that this filing is not inconsistent with the CEA and the CFTC’s regulations. In particular, the following core principles may be pertinent:

Core Principle 6 – Emergency Authority: This core principle requires that the contract market maintain the authority to intervene as necessary to maintain markets with fair and orderly trading and to take actions necessary to preserve the integrity of its markets. ProphetX Rule 2.8 (Emergency Authority) provides the Exchange with authority to take actions, including modifying trading hours, that it deems reasonably necessary or appropriate. The temporary change in trading hours described in this filing is undertaken

pursuant to that authority in order to conduct maintenance that supports the continued fair and orderly functioning of the Exchange.

Core Principle 7 – Availability of General Information: This core principle requires that the contract market make public information concerning the rules of the contract market. This filing provides Market Participants with information pertaining to the availability of trading on ProphetX.

Core Principle 8 – Daily Publication of Trading Information: This core principle requires that daily information on settlement prices, volume, and open interest be published by the contract market. This filing will not impact ProphetX's compliance with Core Principle 8, as trades will continue to be reported on the calendar day (in Eastern Time) on which they occur. This information is published by ProphetX on a daily basis.

No opposing views to the contrary have been expressed.

ProphetX accordingly certifies that this filing complies with the requirements of the Commodity Exchange Act and the rules and regulations promulgated thereunder, and further certifies that, concurrent with this filing, a copy of this submission has been posted on the ProphetX website and may be accessed at: <https://www.prophetx.co/lobby/t-c/filings>.

If you have any questions or comments or require further information, please do not hesitate to contact me.

Sincerely,

/s/ Gabe Wong

Gabe Wong
Chief Regulatory Officer
ProphetX LLC
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