VIA CFTC PORTAL

January 8, 2026

Mr. Christopher Kirkpatrick
Commodity Futures Trading Commission
1155 21st Street NW
Three Lafayette Centre
Washington, DC 20581

Re: QCX LLC 40.6(a) Fee Schedule Submission

I. Introduction

QCX LLC ("Polymarket US" or the "Exchange"), a designated contract market ("DCM") registered with the Commodity Futures Trading Commission ("Commission" or "CFTC"), hereby files this notice pursuant to Commission Regulation 40.6(a) to self-certify revisions to its fee schedule, as set forth in Exhibit K to the Exchange's Form DCM (the "Submission"). The Exchange is submitting simultaneously a petition for confidential treatment of the Submission pursuant to Section 8(a) of the Commodity Exchange Act ("CEA") and 145.9(d) of the Commission's regulations, a copy of which is enclosed with this letter.

Polymarket US operates a centralized order book offering fully collateralized contracts. As a registered DCM, Polymarket US is committed to maintaining a transparent, reasonable, and non-discriminatory fee structure consistent with the CEA and Commission regulations. The proposed revisions modify the Exchange's trading fee structure by increasing the taker fee assessed on aggressive orders from 1 basis point (0.01%) to 10 basis points (0.10%) of the total contract premium. No other changes to the Exchange's fee structure are being made.

The revised fee schedule is attached as Attachment A, with the specific text being amended indicated in red, and shall become effective one (1) business day following certification to the Commission, as permitted under Commission Regulation 40.6. Capitalized terms used in this notice but not defined herein shall retain the meanings assigned to them in the Exchange's rules.

II. Concise Explanation and Analysis of the Revisions, and Their Compliance with Applicable Provisions of the CEA, Including the Core Principles and Commission Regulations

The proposed revision to the Exchange's fee schedule is limited to an increase in the taker fee rate applicable to aggressive orders executed on the Exchange. The fee continues to apply uniformly to all market participants and does not introduce any differentiation among customers or classes of customers.

The purpose of the revision is to better align the Exchange's fee structure with the costs associated with operating, maintaining, and enhancing a centralized, continuously available trading, surveillance, and risk management system, while continuing to provide transparent and non-discriminatory access to the Exchange.

The Exchange has reviewed the proposed change for consistency with the applicable provisions of the CEA and Commission regulations, including the Core Principles for designated contract markets. In particular, the Exchange has evaluated the revision under Core Principle 2 (Compliance with Rules) and Core Principle 18 (Fees) and has determined that the revised taker fee is reasonable, equitably allocated, and not applied in a discriminatory manner.

The proposed increase does not alter the structure or methodology of the fee, does not affect market access, and does not impose disparate costs on similarly situated participants. The Exchange believes the revised fee level remains consistent with market practices and supports the continued operation and integrity of the Exchange.

III. Certification

QCX LLC hereby certifies to the CFTC, pursuant to the procedures set forth in Commission Regulation 40.6, that the attached fee schedule submission complies with the Commodity Exchange Act, as amended, and the regulations promulgated thereunder. Further, the Exchange is not aware of any substantive opposing views expressed regarding the proposed fee change.

QCX LLC additionally certifies that, simultaneously with this filing, a copy of this submission was published on the Exchange's website, accessible at www.polymarketexchange.com.

Please contact me using the information below if you have any questions regarding this notice.

Respectfully submitted,

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Attachments:

Attachment A: Exhibit K (Confidential)