

**CHICAGO MECHANICAL EXCHANGE, INC.**  
**ANALYSIS OF DELIVERABLE SUPPLY**  
**LIVE CATTLE FUTURES**  
**AUGUST 2018**

**Background:**

Live Cattle futures (“Contract”) is a physically-deliverable futures contract whose terms are satisfied by the delivery of fed cattle meeting contract specifications that have been transported to and then graded at approved locations. More specifically, the Contract allows for the delivery of qualified fed steers or heifers to either CME-approved stockyards or CME-approved slaughter plants. A short position holder initiates the Contract’s delivery process by tendering a certificate of delivery to the Clearing House designating a CME-approved stockyard to which the cattle will be tendered for delivery and the feedlot from which the cattle originate. The long position holder who ultimately receives the delivery notice may accept either a live-graded delivery at that designated stockyard or may alternatively choose to arrange for a carcass-graded delivery at a CME-approved slaughter plant corresponding to the designated stockyard or to a CME-approved slaughter plant within 225 road miles of the short position holder’s originating feedlot. The delivery period – defined herein as the timeframe in which a certificate of delivery may be tendered: the first notice day through the last notice day – for an expiring month of the Contract generally lasts roughly one calendar month.<sup>1</sup>

According to the *National Weekly Slaughter Cattle – Committed and Delivered Cattle (USDA LM\_CT142)* report published by the USDA, roughly 21.9 million head of domestically sourced cattle that had been placed on feed (including non-beef bred cattle) were slaughtered (or “delivered” in USDA report) in the United States in 2017. Of that annual number, roughly 5.5 million head of cattle (steer or heifer only) were purchased on a spot (or “negotiated” in USDA report) basis and were delivered live or dressed. Of those 5.5 million head, roughly 14% were transacted outside of the main “5-Area” region (defined further in the “Data Sources” section of this document), bringing the number down to roughly 4.73 million head. Further, eliminating roughly 6.6%<sup>2</sup> of cattle that were either too light (less than 1,050 pounds) or too heavy (greater than 1,350 pounds for heifers or 1,550 pounds for steers), leaves roughly 4.42 million head. In summary, roughly 20.2% of cattle slaughtered in 2017 would fit the description of what CME would estimate as cattle that were available on a spot basis, were geographically located in a region containing at least one Contract delivery point stockyard and would have met the Contract’s specifications for weight.

The vast majority of the domestic fed cattle supply is committed to slaughter plants on a non-spot basis (i.e. a forward contract, a formula-based contract, etc.) and therefore would typically not be in position to be delivered to fulfill a futures contract obligation<sup>3</sup>. Some classes of cattle such as bulls and cows are not representative of the broader cash fed cattle market due to quality, age, and size differences relative to that of steers and heifers and are therefore not deliverable to satisfy the Contract and are not used in this analysis.

The sellers of fed cattle are feedlot operators and the buyers of fed cattle are typically slaughter plant operators (“packers”). Most feedlots are family or individually operated, indicating a low level of industry concentration at the producer level.<sup>4</sup> However, there is a high amount of industry concentration amongst the beef packers: According to the National Cattlemen’s Beef Association (“NCBA”), the four largest beef

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<sup>1</sup> Rule 10104.A in CME Chapter 101 indicates that Certificates of Delivery can be tendered no sooner than the business day following the first Friday of the contract month and not after the third business day following contract expiration. For example, the August 2017 Live Cattle Futures contract had a first notice day of August 7, 2017 and a last notice day of September 6, 2017.

<sup>2</sup> In order to account for weight variance, CME used the standard deviation calculated in the study done by the University of Minnesota (<http://ageconsearch.umn.edu/bitstream/11841/1/pa03di01.pdf>) and applied that to the three-year average live weights from the *USDA 5 Area Monthly Weighted Average Direct Slaughter Cattle* (USDA LM\_CT180).

<sup>3</sup> Some slaughter plant operators have indicated that their formula agreements with feedlots include an option that allows the feedlot to deliver the cattle versus futures positions if market conditions warrant. However, we are not including formula transacted cattle in our deliverable supply estimate as industry sources indicate this option is rarely utilized.

<sup>4</sup> According to the 2012 USDA Census of Agriculture, “In 2012, 80 percent of feedlots were family or individually operated.” [https://www.agcensus.usda.gov/Publications/2012/Online\\_Resources/Highlights/Cattle/Cattle\\_Highlights.pdf](https://www.agcensus.usda.gov/Publications/2012/Online_Resources/Highlights/Cattle/Cattle_Highlights.pdf).

packers represented roughly 90% of the daily beef slaughter capacity among the top ten largest beef packers in the U.S. in 2015.<sup>5</sup>

The fed cattle market is primarily domestic: only about 1% of slaughtered steers and heifers in the U.S. were imported by packers in 2017 according to the *National Weekly Slaughter Cattle – Committed and Delivered Cattle* report. According to the USDA Foreign Agricultural Service, only 193,041 head of any type of cattle were exported out of the U.S. in 2017, representing only a tiny fraction of the total inventory of U.S. cattle.

Fed Cattle are primarily graded in two ways that affect their economic value: quality and yield. Quality grading reflects the expected eating characteristics of the meat (tenderness, flavor, etc.) once it is cooked. The yield grade reflects the estimated amount of lean, edible meat produced by a carcass.<sup>6</sup> Inspecting fed cattle on a carcass-graded basis leads to more precise grading because the grader is able to review the actual carcass, allowing for more accurate premiums and discounts to be assigned to the base price paid for the cattle by the packer. When cattle are inspected on a live-graded basis, the grader must make estimations on future carcass grading outcomes based on external visual indicators when inspecting the live animal. According to the *5-Area Weekly Weighted Average Direct Slaughter Cattle (LM\_CT150)* report, 66% of fed cattle marketed on a spot / negotiated transaction were priced on a live-graded basis between 2015 and 2017, while only 15% of cattle marketed on a formula price agreement were graded on a live basis between 2015 and 2017 (*LM\_CT145 5 Area Weekly Direct Slaughter Cattle – Formula, Grid and Contract Purchases* report).

The Exchange believes that the best method for assessing the availability of fed cattle meeting Contract specifications is to measure the observed transactions of fed cattle between feedlots and packers over time. CME believes that these transactions are indicative of available market-ready fed cattle at any given time given their non-storable nature. The purchases of cattle by packers are subject to livestock mandatory price reporting legislation and therefore the Exchange's analysis of the deliverable supply of fed cattle makes use of mandatorily reported volumes of packer purchases of all grades of beef bred steers and heifers priced on either a live or dressed basis as aggregated and published by the United States Department of Agriculture ("USDA") Agricultural Marketing Service ("AMS") division on a monthly basis.<sup>7</sup>

### **Live Cattle Futures Delivery Capacity:**

The delivery territories for delivery against the Live Cattle futures contract are Colorado; Iowa/Minnesota/South Dakota; Kansas; Nebraska; and Texas/Oklahoma/New Mexico. Cattle may be delivered at par at any of the approved stockyard or slaughter plants with one exception currently: any deliveries whose certificates of delivery were originally tendered for delivery at Worthing, SD to satisfy an October futures contract will be made at a \$1.50/cwt discount to the short position holder making delivery.<sup>8</sup>

USDA AMS provides graders at the stockyard delivery points at the scheduled time of delivery to facilitate deliveries where the long position holder receiving delivery has selected that final settlement and transfer of ownership of the cattle be completed on a live-graded basis. The USDA provides input to the Exchange on their staffing as well as each stockyard's infrastructure (i.e. scales, employees) which are factors in our self-imposed daily limits on the maximum number of contracts that can be delivered on any given day to each stockyard. Based on delivery constraints identified by the USDA, CME instituted a daily limit on how many certificates of delivery could be tendered for delivery at any given stockyard. The daily limits at each stockyard are based on USDA grader estimations on the size and quality of the stockyard as well as their own staffing availability for grading. It is important to note that the daily maximum number of contracts allowed per stockyard by the Exchange is typically lower than the stockyards' actual maximum daily

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<sup>5</sup> See page 48 of this NCBA document:

<http://www.beefusa.org/CMDocs/BeefUSA/Producer%20Ed/2015%20CattleFax%20section.pdf>.

<sup>6</sup> For more information on beef grading, it is suggested to read *Beef Grading* by Daryl Tatum of Colorado State University:

<http://www.beefresearch.org/cmdocs/beefresearch/beef%20grading.pdf>.

<sup>7</sup> Legislation regarding the mandatory reporting of cattle can be found in 7 CFR Part 59, Subpart B - Cattle Reporting: <https://www.gpo.gov/fdsys/pkg/CFR-2016-title7-vol3/pdf/CFR-2016-title7-vol3-part59-subpartB.pdf>.

<sup>8</sup> Please see CME Submission No. 16-304 for further information on the discount applied to deliveries originally tendered to a stockyard in Worthing, SD in the October contract month: <http://www.cmegroup.com/market-regulation/rule-filings/2016/08/16-304.pdf>.

capacity. CME believes that this helps remove the risk of delivery congestion and promotes an orderly delivery process for the Contract.

Each delivery point stockyard conducts feeder cattle sales and other types of cash market auctions each week where the facility is unavailable to provide capacity in support of deliveries for the Contract. It is the responsibility of the delivering short position holder to ensure that the delivery point stockyard will be able to receive a Contract delivery prior to tendering a delivery certificate to that stockyard. However, the stockyards themselves provide an expected schedule to the Exchange of days in which they expect that they will be unable to facilitate Contract deliveries, and the Exchange communicates that schedule to the market as it changes.<sup>9</sup>

**Table 1** in the appendix of this document lists the weekly stockyard delivery capacity for the Contract and blackout days as communicated to the Exchange by the stockyards.

The approved slaughter plant delivery points for the Contract do not have a limit on the number of deliveries that they may receive because the short position holder will be able to make delivery at a stockyard even if the long is unable to schedule a delivery at any of the plants associated with that stockyard. It is the responsibility of the long position holder to schedule a delivery to be received at a slaughter plant if the long prefers for the final settlement of the delivery to be done by a carcass grading instead of by live grading at the originally tendered stockyard. Slaughter plant grading capacity is not an issue because each plant is staffed by USDA meat graders on a daily basis as part of their normal business operations. Because all deliveries must be tendered to a stockyard to initiate the delivery process, the capacity of the stockyard accounts for the delivery constraint irrespective of whether the ultimate delivery consists of live-graded or carcass-graded beef cattle. Further, CME delivery data shows that there were 317 deliveries between 2015 and 2017. Of those, 276 (87%) were delivered on a live-graded basis while 41 (13%) were delivered carcass-graded. As indicated in the “background” section above, the majority of spot / negotiated fed cattle transactions are priced on a live FOB basis, indicating that it is expected for stockyards to receive the majority of Contract deliveries.

#### **Data Sources:**

CME’s analysis of the deliverable supply of fed cattle makes use of data provided by USDA AMS within its *5 Area Monthly Weighted Average Direct Slaughter Cattle – Negotiated* report.<sup>10</sup>

A monthly data series is used because the delivery period for an expiring month of the Contract generally lasts roughly one calendar month. The “5 Area” geographic region – which is comprised of the “Texas/Oklahoma/New Mexico”, “Kansas”, “Nebraska”, “Colorado”, and “Iowa/Minnesota” sub-regions – is used because it most closely represents the geographical area where fed cattle are realistically expected to physically be in a position to be delivered to a delivery point stockyard. Only negotiated cattle were used in this analysis because all other forms of marketing fed cattle result in those cattle being committed to another party and therefore reasonably assumed to be unavailable for delivery by a short position holder of the Contract. Steers and heifers priced on both a live or dressed basis are used in this analysis because both steers and heifers are deliverable and can be graded on either a live or a carcass/dressed basis to satisfy Contract delivery terms. All grades are utilized in this analysis because the four main USDA quality grades of cattle (prime, choice, select, standard) and most predominant yield grades (grades 1 – 5) are deliverable and the terms of the Contract make use of the most current USDA published *National Weekly Direct Slaughter Cattle – Premiums and Discounts* report to assess quality grade and yield grade premiums and discounts on delivered cattle accordingly.

USDA AMS maintains a historical database of its mandatory price reports on its website at the following location: <https://mpr.datamart.ams.usda.gov/>.

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<sup>9</sup> Please see the latest such notice here: <https://www.cmegroup.com/content/dam/cmegroup/notices/clearing/2018/02/Chadv18-048.pdf>

<sup>10</sup> The most current “5 Area monthly Weighted Average Direct Slaughter Cattle – Negotiated” Report can be found at this static location on the USDA’s website: [https://www.ams.usda.gov/mnreports/lm\\_ct180.txt](https://www.ams.usda.gov/mnreports/lm_ct180.txt).

Please see **Table 2** in the Appendix at the end of this document for a list of delivery point stockyard locations and their associated geographical cash market regions, all of which are represented within 5 Area price reports published by USDA AMS.

**Calculation Methodology for Cattle Available for Delivery Pursuant to Contract Specifications:**

The following steps using the *5 Area Monthly Weighted Average Direct Slaughter Cattle – Negotiated* report allow for the estimate of the fed cattle available for delivery pursuant to Contract specifications:

1. Obtain the head count and average weight for “Total all grades” for:
  - a. Live FOB Basis – Beef Breeds, Steers
  - b. Live FOB Basis – Beef Breeds, Heifers
  - c. Dressed Delivered Basis – Beef Breeds, Steers
  - d. Dressed Delivered Basis – Beef Breeds, Heifers
2. Convert the dressed weights to ‘live equivalent weights’ by dividing the dressed weights by 63% (the par yield of carcass graded cattle in the Contract).
3. Multiply each category’s head count by its live-equivalent weight to get the category’s total live-equivalent weight for the month, then add each category’s total monthly live-equivalent weight together to get a monthly total live equivalent weight.
4. Divide the total live equivalent weight for the month by 40,000 lbs. (the size of the futures contract) to determine the number of cattle available for delivery during a given contract month in contract equivalents.

**Analysis of Deliverable Supply:**

Please see **Table 3** in the Appendix at the end of this document for a monthly estimate of fed cattle available for delivery pursuant to Contract specifications for the previous three years using the data and calculation methodology described above.

The Exchange estimates that the average monthly availability of fed cattle meeting Contract specifications over the previous three years was equivalent to 10,057 contracts. The Contract currently has three spot month position limits: 1) 450 contracts on the close of trading on the first business day following the first Friday of the contract month, which is 4.5% of average monthly availability of fed cattle meeting Contract specifications, and 2) 300 contracts on the close of trading on the business day immediately preceding the last 5 trading days of the contract month, which is 3.0% of average monthly availability of fed cattle meeting Contract specifications, and 3) 200 contracts on the close of trading on the business day immediately preceding the last 2 trading days of the contract month, which is 2.0% of average monthly availability of fed cattle meeting Contract specifications.

However, the ability to deliver cattle to fulfill Contract obligations is constrained by the daily live grading capacity limits imposed on the approved stockyards by the Exchange. Therefore, the Exchange measures its estimation of deliverable supply of fed cattle to fulfill Contract delivery obligations based on the maximum stockyard capacity permitted by the Exchange, inclusive of ‘blackout’ days in which the stockyards self-report themselves as not being available to facilitate deliveries as noted more specifically below.

The last tender date is 12 p.m. on the Business Day following the Last Trade Date (“LTD”). This allows the short to schedule delivery on one of four business days (business days 8 through 11 following LTD). Additionally, if the short is unable to obtain clearance from an approved livestock yard to make live delivery between Business Days eight through eleven following LTD, the short can request an extension from the Exchange and, if granted, delivery may occur no later than the 14th Business Day after LTD. Inclusive potential extension days, a delivering short has a total of seven consecutive business days after LTD to schedule delivery at an approved livestock yard (business days eight through 14 following LTD).

Therefore, the Exchange based its estimation of deliverable supply on the maximum livestock yard capacity permitted by the Exchange during the window available for delivery at the livestock yards inclusive of

blackout days in which the livestock yards self-report themselves as not being available to facilitate deliveries. Because the total daily available capacities for all approved livestock yards vary by day, the Exchange determined to measure the delivery window as an average of all available combinations of consecutive delivery days for the number of delivery days in that window.

The deliverable supply is most restrictive after LTD given that the delivery window for contracts tendered following LTD is restricted to up to seven (7) business days, or business days eight through 11 after last trade date plus 3 additional days (i.e., business days eight through 14 following LTD). The Exchange calculated the average of the consecutive seven-day live grading capacity totals to be 2,037 contracts (see **Exhibit A, Table 4**). The Exchange's final spot month position limit of 200 contracts, which is in effect at the close of trading on the business day immediately preceding the last 2 trading days of the contract month, represents 9.82% of the estimated deliverable supply based on the 7-day delivery window.

The Exchange's initial spot month limit of 450 contracts is in effect at the close of trading on the first business day following the first Friday of the contract month and is reduced to 300 contracts at the close of trading on the business day immediately preceding the last 5 trading days of the contract month. Immediately prior to the spot limit step-down from 450 to 300 contracts, the available delivery window is comprised of 13 delivery days, or 5 business days prior to LTD plus business days eight through 14 following LTD, inclusive. The Exchange calculated the average of the consecutive 13-day live grading capacity totals to be 3,783 contracts (see **Exhibit A, Table 6**). The Exchange's initial spot month position limit of 450 contracts represents 11.90% of the estimated deliverable supply based on the 13-day delivery window.

The Exchange's subsequent spot month limit of 300 contracts is in effect at the close of trading on the business day immediately preceding the last 5 trading days of the contract month and is reduced to 200 contracts at the close of trading on the business day immediately preceding the last 2 trading days of the contract month. Immediately prior to the spot limit step-down from 300 to 200 contracts, the available delivery window is comprised of 10 delivery days, or 2 business days prior to LTD plus business days eight through 14 following LTD, inclusive. The Exchange calculated the average of the consecutive 10-day live grading capacity totals to be 2,910 contracts (see **Exhibit A, Table 5**). The Exchange's subsequent spot month position limit of 300 contracts represents 10.31% of the estimated deliverable supply based on the 10-day delivery window.

**Exhibit A**

**Table 1: Maximum Daily Grading Capacity (Contract Equivalents)**

<b>Stockyard</b>	<b>Mon</b>	<b>Tue</b>	<b>Wed</b>	<b>Thu</b>	<b>Fri</b>	<b>Weekly</b>
Amarillo, TX		60	60	60	60	240
*Burwell, NE	15	15	15			45
Clovis, NM	30	30		30	30	120
Dalhart, TX	15	15	15		15	60
Dodge City, KS	40	40		40	40	160
Kearney, NE	15			15	15	45
Lexington, NE	20	20	20			60
Ogallala, NE	25	25			25	75
*Sterling, CO	15				15	30
Syracuse, KS	25	25	25	25		100
Texhoma, OK	30	30		30	30	120
Tulia, TX	30	30	30		30	120
West Point, NE		20	20		20	60
Worthing, SD		60		60	60	180
Wray, CO	10		10	10	10	40
<b>Total Daily Capacity (inclusive of blackout dates)</b>	<b>270</b>	<b>370</b>	<b>195</b>	<b>270</b>	<b>350</b>	<b>1,455</b>

\*New Delivery Points

**Table 2: USDA Cash Reporting Regions & Associated Stockyard Delivery Points**

<b>USDA Cash Reporting Region</b>	<b>Associated Stockyard Delivery Points</b>
Iowa / Minnesota	Worthing, SD
Colorado	Sterling, CO; Wray, CO
Nebraska	Burwell, NE; Ogallala, NE; West Point, NE; Kearney, NE; Lexington, NE
Kansas	Dodge City, KS; Syracuse, KS
Texas / Oklahoma / New Mexico	Amarillo, TX; Clovis, NM; Texhoma, OK; Tulia, TX; Dalhart, TX
5-Area	Representative of all delivery points

**Table 3: Monthly negotiated steers and heifers by contract month (in Contract Equivalents, or 40,000 live equivalent pounds)**

Contract Month	Contract Year	Dressed Heifers	Dressed Steers	Live Heifers	Live Steers	Total
Feb	2015	1,002	2,042	1,725	2,357	7,126
	2016	1,330	2,415	2,516	3,333	9,594
	2017	1,057	1,770	2,954	6,241	12,022
Apr	2015	939	2,336	1,238	2,216	6,729
	2016	1,051	3,110	2,086	4,043	10,290
	2017	735	2,594	2,504	4,800	10,634
Jun	2015	770	2,221	969	2,353	6,313
	2016	1,053	2,774	2,144	5,693	11,664
	2017	981	2,907	2,457	5,726	12,072
Aug	2015	768	2,529	1,032	3,148	7,477
	2016	1,225	3,530	2,618	5,911	13,284
	2017	884	2,609	2,214	6,102	11,810
Oct	2015	1,153	2,106	2,044	3,876	9,179
	2016	1,123	2,202	2,414	4,605	10,344
	2017	910	1,846	2,680	5,481	10,917
Dec	2015	1,997	3,290	1,948	3,317	10,552
	2016	1,316	2,824	2,620	4,204	10,964
	2017	886	1,695	2,464	5,005	10,050
<b>3-Year Avg.</b>		1,066	2,489	2,146	4,356	<b>10,057</b>

**Table 4: Consecutive Seven-Day Grading Capacity Totals (in Contract Equivalents)**

Consecutive 7-Day Combination	Daily Grading Capacity							Total Grading Capacity
M-T-W-TH-F:M-T	270	370	195	270	350	270	370	2,095
T-W-TH-F:M-T-W	370	195	270	350	270	370	195	2,020
W-TH-F:M-T-W-TH	195	270	350	270	370	195	270	1,920
Th-F:M-T-W-TH-F	270	350	270	370	195	270	350	2,075
F:M-T-W-TH-F:M	350	270	370	195	270	350	270	2,075
							<b>Avg</b>	<b>2,037</b>

**Table 5: Consecutive 10-Day Grading Capacity Totals (in Contract Equivalents)**

Consecutive 10-Day Combination	Daily Grading Capacity										Total Grading Capacity	
M-T-W-TH-F:M-T-W-TH-F	270	370	195	270	350	270	370	195	270	350	2,910	
T-W-TH-F:M-T-W-TH-F:M	370	195	270	350	270	370	195	270	350	270	2,910	
W-TH-F:M-T-W-TH-F:M-T	195	270	350	270	370	195	270	350	270	370	2,910	
Th-F:M-T-W-TH-F:M-T-W	270	350	270	370	195	270	350	270	370	195	2,910	
F:M-T-W-TH-F:M-T-W-TH	350	270	370	195	270	350	270	370	195	270	2,910	
											<b>Avg</b>	<b>2,910</b>

**Table 6: Consecutive 13-Day Grading Capacity Totals (in Contract Equivalents)**

Consecutive 13-Day Combination	Daily Grading Capacity													Total Grading Capacity	
M-T-W-TH-F:M-T-W-TH-F:M-T-W	270	370	195	270	350	270	370	195	270	350	270	370	195	3,745	
T-W-TH-F:M-T-W-TH-F:M-T-W-TH	370	195	270	350	270	370	195	270	350	270	370	195	270	3,745	
W-TH-F:M-T-W-TH-F:M-T-W-TH-F	195	270	350	270	370	195	270	350	270	370	195	270	350	3,725	
Th-F:M-T-W-TH-F:M-T-W-TH-F:M	270	350	270	370	195	270	350	270	370	195	270	350	270	3,800	
F:M-T-W-TH-F:M-T-W-TH-F:M-T	350	270	370	195	270	350	270	370	195	270	350	270	370	3,900	
														<b>Avg</b>	<b>3,783</b>