

Rule Self-Certification

May 15, 2015

VIA ELECTRONIC PORTAL

Christopher J. Kirkpatrick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Center
1155 21st Street, N.W.
Washington, D.C. 20581

Re: **Regulation §40.6 Submission Certification
Trading Incentive Program
Reference File: SR-NFX-2015-30**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (“Act”), and Section 40.6(a) of the regulations promulgated by the Commodity Futures Trading Commission (“Commission”) under the Act, NASDAQ Futures, Inc. (“Exchange” or “NFX”) submits this self-certification to implement a trading incentive program (“Program”) related to certain new energy products (the “Energy Products”). The Program will be implemented on the date of the initial listing of 28 Energy Products (the “Initial Qualifying Contracts”).¹ The Exchange agrees to recertify this Program within one year of this certification.

¹ The 28 Initial Qualifying Contracts are NFX Brent Crude Financial Futures; NFX Options on NFX Brent Crude Financial Futures; NFX WTI Crude Oil Financial Futures; NFX Options on NFX WTI Crude Oil Financial Futures; NFX Low Sulphur Gasoil Financial Futures; NFX Heating Oil Financial Futures; NFX RBOB Gasoline Financial Futures; NFX Henry Hub Natural Gas Financial Futures – 2,500; NFX Henry Hub Natural Gas Penultimate Financial Futures – 2,500; NFX Henry Hub Natural Gas Financial Futures – 10,000; NFX Henry Hub Natural Gas Penultimate Financial Futures – 10,000; NFX Options on NFX Henry Hub Penultimate Financial Futures – 10,000 (LNQ); NFX CAISO NP-15 Hub Day-Ahead Off-Peak Financial Futures; NFX CAISO NP-15 Hub Day-Ahead Peak Financial Futures; NFX CAISO SP-15 Hub Day-Ahead Off-Peak Financial Futures; NFX CAISO SP-15 Hub Day-Ahead Peak Financial Futures; NFX ISO-NE Massachusetts Hub Day-Ahead Off-Peak Financial Futures; NFX ISO-NE Massachusetts Hub Day-Ahead Peak Financial Futures; NFX MISO Indiana Hub Real-Time Off-Peak Financial Futures; NFX MISO Indiana Hub Real-Time Peak Financial Futures; NFX

In connection with the listing of Energy Products, the Exchange will implement a Program to incent Futures Participants, as well as Authorized Customers, to enhance liquidity in the Energy Products listed on the Exchange. The details of the Program are included in Confidential Appendix 1, attached to this letter, which the Exchange is submitting with a request for confidential treatment under FOIA. The resulting increase in liquidity generated by the Program benefits all participants in the market. The Exchange believes that the Program is consistent with Core Principles 2 (Compliance with Rules), 4 (Prevention of Market Disruption), 9 (Execution of Transactions), 12 (Protection of Market Participants), 18 (Recordkeeping) and 19 (Antitrust Considerations) under Section 5 of the Act because the Program does not incentivize manipulative trading or market abuse and will not impact the Exchange's ability to perform its trade practice and market surveillance obligations under the Act.

With respect to compliance with Core Principle 2, as noted above, the Exchange's Rule at Chapter III, Section 24, entitled "General Trading Standards and Prohibited Practices" prohibits abusive trading practices. Also, the Exchange's Rulebook at Chapter III, Sections 6 through 15 includes Customer Protection Rules that apply when a Futures Participant enters a trade on behalf of a Customer. The Exchange's Rules include prohibitions against fraudulent, non-competitive, unfair or abusive practices. All Futures Participants that participate in the Program are subject to NFX Rules.

With respect to compliance with Core Principle 4, the Exchange's market regulation staff will monitor trading in the Program's products to prevent manipulative trading and market abuse. Additionally, the Exchange has implemented systems to track Program participants' obligations under the Program to ensure compliance with earned incentives. The incentives offered as part of the Program will not impact the manner in which Orders will be executed on NFX. Pursuant to the Exchange Rules at Chapter VI, the Surveillance and Enforcement groups are authorized to investigate trading activities on the Exchange, and initiate enforcement procedures to ensure compliance with the Rules.

The Exchange's Rules at Chapter III, Section 19, entitled "Exchange Access to Position Information" provide that the Exchange shall have the authority to obtain from any Futures Participant information with respect to positions of such Futures Participant or any Customer of such Futures Participant. The Exchange's Rules at Chapter III, Section 16 require Futures Participants to submit a daily report of all Large Trader Reporting levels as set forth by the Exchange.

PJM AEP Dayton Hub Real-Time Off-Peak Financial Futures; NFX PJM AEP Dayton Hub Real-Time Peak Financial Futures; NFX PJM Northern Illinois Hub Real-Time Off-Peak Financial Futures; NFX PJM Northern Illinois Hub Real-Time Peak Financial Futures; NFX PJM Western Hub Day-Ahead Off-Peak Financial Futures; NFX PJM Western Hub Day-Ahead Peak Financial Futures; NFX PJM Western Hub Real-Time Off-Peak Financial Futures; and NFX PJM Western Hub Real-Time Peak Financial Futures. See SR-NFX-2015-10 filed March 11, 2015.

The Exchange's Rules provide that all matched trades generated by the Trading System, after the application of pre-trade risk parameters, will be automatically submitted to the Clearing Corporation as described in Chapter V, Section 2. Chapter II, Section 1 of the Exchange's Rules requires that all Futures Participants must be members of the Clearing Corporation or maintain a clearing account with a Clearing Futures Participant. Futures commission merchants must maintain an account directly with the Clearing Corporation. Clearing Futures Participants are required to guarantee all trades transacted on NFX on behalf of itself, its Customers and Non-Clearing Futures Participants. Clearing Futures Participants must guarantee and assume financial responsibility for all Exchange Contracts of each Futures Participant guaranteed by it, and will be liable for all trades made by that Futures Participant. The Exchange requires a similar guarantee for Authorized Customers submitting trades into the Trading System via Direct Access pursuant to Chapter V, Section 4. The Exchange's Rules governing minimum financial requirements and protection of Customer funds are set forth in Chapter III. Pursuant to Chapter IV, Section 7, the Exchange requires that Authorized Risk Officers of the Clearing Futures Participant initially set and adjust pre-trade risk parameters for Futures Participants, Authorized Traders and Authorized Customers.

The Program will be subject to the Exchange's record retention policies which comply with the Act. Futures Participants, Authorized Traders and Authorized Customers are required to maintain audit trail information as specified in Exchange Rules at Chapter III, Section 1, Chapter V, Section 1(f)(v) and Chapter V, Section 4(j).

With respect to compliance with Core Principle 9, the Energy Contract trading incentives are designed to promote liquidity in the new contracts, thus enhancing competition. Provisions for termination of the incentives are triggered upon achievement of a target, indicating a level of acceptance of the contracts by the market. The Exchange has no plans to extend the program beyond what is needed to achieve sustainable volumes. Additionally, the Exchange will continue to operate an electronic trading facility that provides Futures Participants with the ability to execute Orders within the Exchange's Order Book and Combination Order Book from the interaction of multiple bids and offers within a predetermined automated trade matching and execution algorithm. Orders submitted into the Trading System will continue to be matched in either Price-Time priority or Size Pro-Rata priority order as specified by the Exchange in Chapter IV, Section 5. The Exchange specifies the types of Orders that will be accepted by the Trading System in Chapter IV, Section 4. Finally, the Exchange separately describes its Rules for executing transactions outside of the Order Book, such as Block Trades and exchange for related positions, in Chapter IV, Sections 10 and 11 respectively.

With respect to compliance with Core Principle 12, as noted above, all trading of the energy contracts will be subject to the Exchange's rules, designed to achieve fair and equitable trading of all listed contracts. Chapter III of the Exchange's Rulebook contains prohibitions precluding intermediaries from disadvantaging their customers. Improper conduct and trade practices will be investigated and adjudicated as described in Chapter VI of the Exchange's Rules. The procedures for executing trades through the Exchange's Trading System, which are described in the Exchange's Rules at Chapters IV and V, are designed to promote fair and equitable trading on the Exchange.

With respect to compliance with Core Principle 18, the Exchange's recordkeeping program satisfies the relevant criteria set forth in §1.31 of the Commission Regulations. The Exchange's Regulatory Services Provider, NFA, generates records relating to the provision of services pursuant to an RSA. Such records are maintained in accordance with the Act and Commission Regulations.

With respect to compliance with Core Principle 19, the Program does not result in an unreasonable restraint of trade, or the imposition of any material anticompetitive burden. If sufficient liquidity is achieved, the Program should enhance trade and competition by providing an alternative to the incumbent exchanges.

The Exchange will make public daily information on settlement prices, volume, open interest, and opening and closing ranges for actively traded contracts. Trading information is published on the Exchange's website on the next business day prior to the opening.

There were no opposing views among the Exchange's Board of Directors, members or market participants. The Exchange hereby certifies that the Program complies with the Commodity Exchange Act and regulations thereunder. The Exchange also certifies that a notice of pending certification with the Commission and a copy of this submission have been concurrently posted on the Exchange's website at WWW.NASDAQOMX.COM/NASDAQ-FUTURES .

If you require any additional information regarding the submission, please contact Steve Matthews at (301) 978-8458 or Carla Behnfeldt at (215) 496-5208. Please reference SR-NFX-2015-30 in any related correspondence.

Regards,

A handwritten signature in black ink that reads "Daniel R Carrigan". The signature is written in a cursive, flowing style.

Daniel Carrigan
President

cc: National Futures Association
Lois Gregory, CFTC

Exhibit A

New language is underlined.

NASDAQ FUTURES FEE SCHEDULE

* * * * *

Section IV – Incentive Program

Purpose: The purpose of this Program is to incent a number of key participants representing different market sectors who will be Futures Participants or Authorized Customers to enhance liquidity in the Energy Products identified below listed on the Exchange. The resulting increase in liquidity benefits all participants in the market.

Product Scope:

The following Contracts are subject to the Program: NFX Brent Crude Financial Futures; NFX Options on NFX Brent Crude Financial Futures; NFX WTI Crude Oil Financial Futures; NFX Options on NFX WTI Crude Oil Financial Futures; NFX Low Sulphur Gasoil Financial Futures; NFX Heating Oil Financial Futures; NFX RBOB Gasoline Financial Futures; NFX Henry Hub Natural Gas Financial Futures – 2,500; NFX Henry Hub Natural Gas Penultimate Financial Futures – 2,500; NFX Henry Hub Natural Gas Financial Futures – 10,000; NFX Henry Hub Natural Gas Penultimate Financial Futures – 10,000; NFX Options on NFX Henry Hub Penultimate Financial Futures – 10,000 (LNQ); NFX CAISO NP-15 Hub Day-Ahead Off-Peak Financial Futures; NFX CAISO NP-15 Hub Day-Ahead Peak Financial Futures; NFX CAISO SP-15 Hub Day-Ahead Off-Peak Financial Futures; NFX CAISO SP-15 Hub Day-Ahead Peak Financial Futures; NFX ISO-NE Massachusetts Hub Day-Ahead Off-Peak Financial Futures; NFX ISO-NE Massachusetts Hub Day-Ahead Peak Financial Futures; NFX MISO Indiana Hub Real-Time Off-Peak Financial Futures; NFX MISO Indiana Hub Real-Time Peak Financial Futures; NFX PJM AEP Dayton Hub Real-Time Off-Peak Financial Futures; NFX PJM AEP Dayton Hub Real-Time Peak Financial Futures; NFX PJM Northern Illinois Hub Real-Time Off-Peak Financial Futures; NFX PJM Northern Illinois Hub Real-Time Peak Financial Futures; NFX PJM Western Hub Day-Ahead Off-Peak Financial Futures; NFX PJM Western Hub Day-Ahead Peak Financial Futures; NFX PJM Western Hub Real-Time Off-Peak Financial Futures; and NFX PJM Western Hub Real-Time Peak Financial Futures.

Eligible Participants:

Participants are certain Futures Participants or Authorized Customers, subject to the Rules of the Exchange, and must execute a requisite amount of volume on the Exchange to be eligible for incentives.