



## Rule Self-Certification

May 18, 2015

### VIA ELECTRONIC PORTAL

Christopher J. Kirkpatrick  
Office of the Secretariat  
Commodity Futures Trading Commission  
Three Lafayette Center  
1155 21<sup>st</sup> Street, N.W.  
Washington, DC 20581

Re: **Regulation §40.6 Submission Certification**  
**Authorized Trader Reference Guide**  
**Reference File: SR-NFX-2015-32**

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 under the Act, NASDAQ Futures, Inc. (“NFX” or “Exchange”) adopts a new Authorized Trader and Account Management Reference Guide. The new Reference Guide will be implemented on June 2, 2015. The text of this Reference Guide is set forth in Exhibit A.

The Exchange is adopting this Authorized Trader and Account Management Reference Guide to provide further guidance to market participants with respect to creating, amending and maintaining Authorized Trader IDs in CAST. This Reference Guide will be posted on the Exchange’s website to provide market participants additional information on complying with the Exchange’s requirements concerning Authorized Trader IDs.

With respect to the designated contract market core principles (“Core Principles”) as set forth in the Act:

- *Compliance with Rules*: Today the Exchange has in place Rules which describe the manner in which Futures Participants may access and trade on NFX. Chapter II, Section I provides for the qualifications and rules of participation applicable to Futures Participants as well as Authorized Traders. Chapter V, Section 18 describes prohibited activities with respect to the Trading System.

Trading is subject to the Rules at Chapter III of the Exchange's Rulebook, which include prohibitions against fraudulent, noncompetitive, unfair and abusive practices. Additionally, trading is subject to the trading procedures and standards in Chapter V of the Rulebook. The Exchange's disciplinary Rules are contained in Chapter VI of the Rulebook.

- *Prevention of Market Disruption:* The Exchange's Regulatory Department, which handles real-time surveillance, monitors trading activity on the Exchange with a SMARTS Surveillance Application through which the Exchange can track activity of specific Authorized Traders, monitor price and volume information and receive alerts regarding market messages. The Exchange's Regulatory Department, which handles real-time surveillance in conjunction with staff that handles T+1 surveillance, utilizes data collected by the SMARTS Surveillance Application to monitor price movements, as well as market conditions and volumes to detect suspicious activity such as manipulation, disruptive trading and other abnormal market activity.
- *Availability of Contract Information.* The Exchange has indicated within its trading Rules where specific information relates to a particular Contract. The Exchange will post the terms and conditions of Exchange Contracts in its Rulebook along with trading Rules.
- *Publication of Information.* The Exchange will publish daily information on settlement prices, volume, open interest and opening and closing ranges for actively traded Contracts on its website. The Exchange's volume information will include information on the volume of Block Trades.
- *Execution of Transactions.* The Exchange operates an electronic trading facility that provides Futures Participants with the ability to execute Orders within the Exchange's Order Book 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. The Exchange specifies the types of Orders that will be accepted by the Trading System in recently filed Chapter IV, Section 4.
- *Protection of market participants.* Chapter III of the Exchange's Rulebook contains prohibitions precluding intermediaries from disadvantaging their customers. These rules apply to trading in all Contracts.

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There were no opposing views among the Exchange's Board of Directors, members or market participants. The Exchange hereby certifies that this Reference Guide 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](http://www.nasdaqomx.com/nasdaq-futures).

If you require any additional information regarding the submission, please contact Angela S. Dunn at +1 215 496 5692 or via e-mail at [angela.dunn@nasdaq.com](mailto:angela.dunn@nasdaq.com). Please reference SR-NFX-2015-32 in any related correspondence.

Regards,

A handwritten signature in black ink that reads "Daniel R. Carrigan". The signature is written in a cursive style with a large, sweeping "D" and "C".

Daniel R. Carrigan  
President

cc: National Futures Association  
The Options Clearing Corporation

**Exhibit A**

**Nasdaq Futures, Inc. (NFX)  
CAST User Guide  
Authorized Trader & Account  
Management Reference Guide**

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Version 1.00 | 2015-5-18



## **CONFIDENTIALITY/DISCLAIMER**

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# 1 OVERVIEW

NFX Clearing Futures Participants (“FCMs”) will use CQG’s CAST database application (“NFX CAST”) to create, maintain, and store the following mandatory information within the application:

- Customer/Entity Information
- Authorized Trader (“AT”)
- FCM Accounts
- Authorized Trader Account Authorization

CQG’s CAST will manage customer information, account configuration, risk controls, billing configurations, as well as other information. The NFX instance of CAST is completely separate from and will have no connection or ability to integrate with any other existing version of CAST.

This Reference Guide provides an overview of how to input all necessary information into NFX CAST, amend the information and otherwise maintain such information.

## 2 OBTAINING NFX CAST LOGIN CREDENTIALS

Every FCM will have its own secure database whereby NFX will provide NFX CAST User IDs to each FCM’s registered representative(s) that is listed on the NFX CAST Request Form which is available via the following link: [http://www.nasdaqomx.com/digitalAssets/98/98621\\_nfx-cast---registration-form.pdf](http://www.nasdaqomx.com/digitalAssets/98/98621_nfx-cast---registration-form.pdf). The completed form should be returned to NFX Market Operations ([NFXops@nasdaq.com](mailto:NFXops@nasdaq.com)) in order to receive a User ID and password.

## 3 LOGGING INTO CAST

CAST is a web-based application that can be accessed via:

<https://www.cqgtrader.com/CAST/Logon/logon.asp>

Upon login, FCMs will be prompted to change the password by clicking on the Utilities tab in the upper right corner of the web page.

## 4 NFX CAST PROCESS

The mandatory information required to be entered into NFX CAST is as follows:

- Customer or Trading Entity Information
- Authorized Trader Information and Trader ID (“ATID”)
- Accounts and Account authorizations

Once a Customer or Trading Entity is established, multiple Authorized Traders, Accounts, and Account authorizations can be associated with the Entity.

Sections 5 to 7 below will describe the process for inputting the relevant information into CAST.



# 5 CUSTOMER MANAGEMENT

The first process that must be completed in CAST is to create Customers that will be transacting on NFX. Each Customer can be either a Customer or Proprietary (House) Entity (collectively “Authorized Customer”) and can be an individual or multiple corporate types.

## Create New Customer

The screenshot shows the 'Create New Customer' form with the following fields and values:

- Entity Type:** Individual
- SSN, TaxID, or W8:** (empty)
- Customer Info:**
  - FCM:** <Choose FCM> (Select the FCM to which the Customer belongs)
  - Sales Series:** (Select one or more Sales Series to which the Customer belongs)
  - None:** (empty list)
- Customer Name:**
  - First Name:** (empty)
  - MI:** (empty)
  - Last Name:** (empty)
- Address:**
  - Address 1:** (empty)
  - Address 2:** (empty)
  - City:** (empty)
  - State/Province:** NONE
  - ZIP/Postal Code:** (empty)
  - Country:** NONE

A 'Refresh' button is located at the bottom left of the form.

From the **Customers** menu, click **New Customer**

1. Select Corporate, General Partnership, Individual, Joint, Limited Partnership, or Trust for **Entity Type**.
2. **SSN, TaxID, or W8** is **NOT** required.
3. Enter the **Company Name**. This field is not listed for individual entities.
4. Select the FCM. There will be only one option available. The FCM selection will trigger the population of the Sales Series. Do not select any Sales Series as they will be used in another section of CAST.
5. Enter the customer's **Name** and **Address** (Phone/Fax/Email are optional but CAST requires that you populate the first Email field with at least "."). This is generally the main contact individual for the Customer.
6. Click **Save**. CAST will then ask if you would like to set this Customer up as a trader (guided set up): If you choose not to complete the Trader Information, you can add that information later using the **New Trader** page. Clicking Exit will complete the Customer.

If you choose to use the guided set up for this Customer, click **OK** and go to **Adding Traders**.

At this point you have completed the Customer creation process. To see a list of your Customers, click on **Customer Info** and search by Customer Name or Customer ID. CAST automatically generates a Customer ID but NFX will not use the Customer ID in any way.

## 5.1 UPDATING A CUSTOMER

To update any Customer information the following steps are necessary:

1. From the **Customers** menu, click **Customer Info**.
2. Make changes.
3. Click **Save**.

## 5.2 REMOVING CUSTOMERS

Only Customers without active Accounts and traders can be removed as follows:

1. From the **Customers** menu, click **Customer Info**.
2. Click the **Remove** button.
3. When prompted to confirm this choice, click **OK**.
4. If you receive a warning message stating that the association with a trader (such as a master account) is removed, click **OK**.

# 6 MANAGING TRADERS

## 6.1 AUTHORIZED TRADER ID

It is each FCM's responsibility to insure that each and every Authorized Trader is properly configured and the Authorized Trader ID (ATID) is included on EVERY trade message regardless of how the Authorized Trader accesses the NFX Trading System. Tag 452 must be populated with R = 11, Originating Trader ID; and Tag 448 must be populated with the ATID.

TAG	FIX TAG NAME	REQ'D	COMMENT
	Standard Header	Y	MsgType = D
11	ClOrdID	Y	Unique identifier set by the client.
453	NoPartyIDs		Optional repeating group.
→	448	PartyID	Party identifier.
→	447	PartyIDSource	Valid values:
			D = Proprietary/Custom code
			Identifies the type of role for the PartyID specified. Valid values: 11 = Order Originating Trader 14 = Give-Up Clearing Firm
→	452	PartyRole	Q

Failure to include an ATID on a single trade message or multiple trade messages is a violation of the NFX Rules. See the link to the NFX Futures Regulatory Alert #2015-6 below:

<http://www.nasdaqtrader.com/MicroNews.aspx?id=FRA2015-6>

Each FCM will be responsible for creating each trader's ATID. The ATID can be up to a maximum of 8 alpha-numeric characters and must be based on the trader's first initial and last name or as close to that as

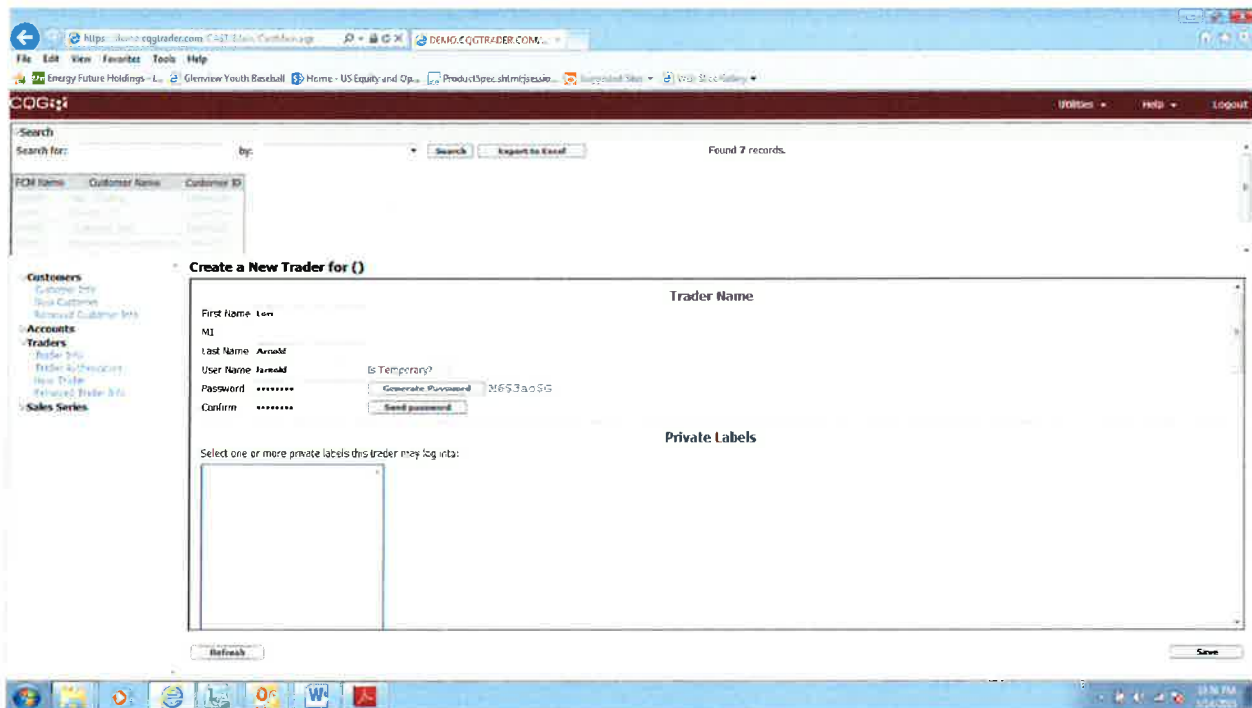
possible. It is important that the ATID be as close to the trader's first initial and last name as possible for ease of identification as OTC Brokers will need to include the ATID on all Block Trade reports via a drop down menu. For example:

Example Trader Name	ATID
Alexander Hamilton	ahamilto
Andrew King	aking

CAST will prevent the creation of duplicate ATIDs, and will alert the CAST User if a duplicate ATID has been entered. FCMs should use numbers to distinguish between duplicate ATIDs. For example:

Example Trader Name	ATID
Tom Brady	tbrady
Thomas Brady	tbrady1

## 6.2 ADDING A TRADER



1. On the **Traders** menu, click **New Trader**.
2. Enter the trader's name.
3. The NFX Authorized Trader ID (ATID) is entered in the User Name field. Create the trader's ATID per requirements in Section 7.1.
4. Click **Generate Password**. This Password will not be used and should be ignored, but must be generated to complete the trader setup.
5. In the **FCMs** field, select the FCM (only the FCM that the CAST User is associated with will be an option).
6. In the **Sales Series** field, select BLOCK/EFRP and/or ATS if they apply to the trader:
  - BLOCK/EFRP if the trader is eligible to enter into BLOCK or EFRP transactions

- This is an important designation as it flags BLOCK/EFRP eligible ATs for all the BLOCK/EFRP reporting tools.
- ATS if the trader represents an Automated Trading System (any type of GUI order entry precludes the Authorized Trader from being considered an ATS operator).
- DO NOT select either Agent or principal in this section

7. Enter the trader's address. The full address is not required but State and Country are required by CAST to complete the trader setup.

8. Enter the trader's contact information. This information is not required but CAST requires that you populate the first Email field with at least "."

9. Click the **Save** button

At this point the trader has been added to NFX CAST. NFX CAST will automatically move to the trader authorization page to authorize the trader for previously created accounts. If you have already created accounts you can search for the account or accounts the trader will have access to and select them. If no accounts exist, see Section 7.2 Creating an Account.

To see a list of your traders, click on **Trader Info** and select the search criteria you desire. NFX CAST automatically generates a Trader ID but NFX will not use the Trader ID in any way. NFX will only use the ATID which is listed as the Trader User Name in NFX CAST.

### 6.3 VIEWING OR UPDATING TRADER INFORMATION

1. On the **Traders** menu, click **Trader Info**.
2. Make changes.
3. Click **Save**.

### 6.4 REMOVING TRADERS

On the **Traders** menu, click **Trader Info**.

2. Click **Remove**.
3. Click **OK** on the confirmation message.

Note that the removal of traders in CAST will have no effect on the NFX Trading System. It is FCM's responsibility to insure that the removed trader does not have access to the Trading System and the respective trader's credentials have been terminated (see Section 8).

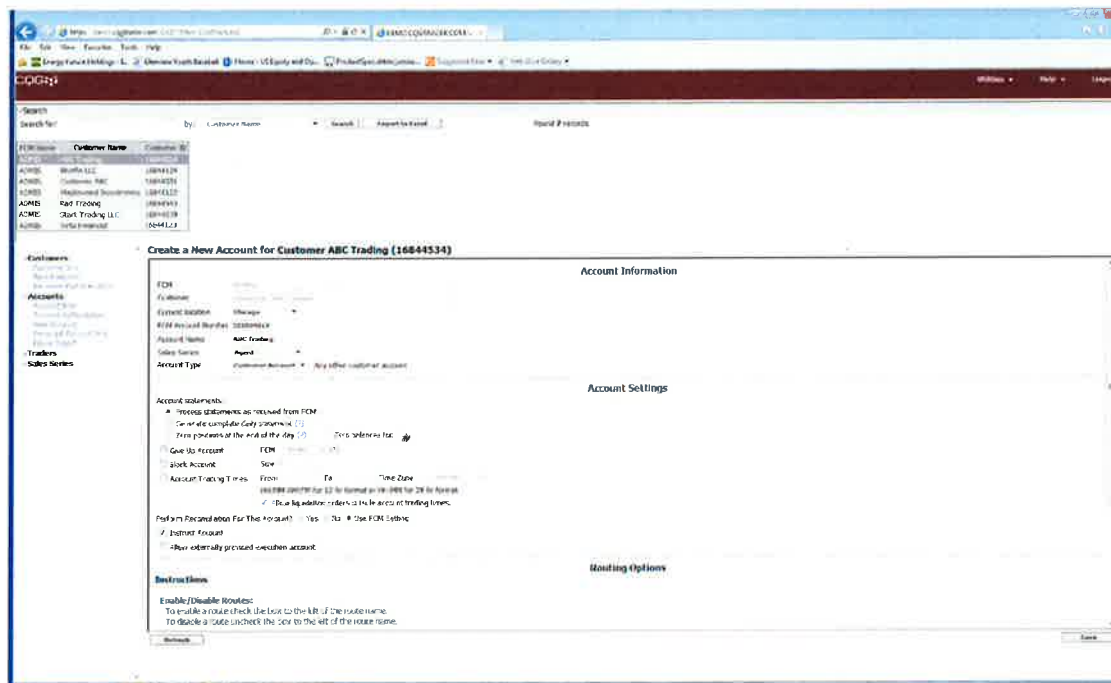
## 7 MANAGING ACCOUNTS AND ACCOUNT AUTHORIZATIONS

### 7.1 ACCOUNTS AND ACCOUNT AUTHORIZATIONS

FCMs will use NFX CAST to register accounts and authorize traders for access to specific accounts. Tag 1 of each trade message is the Account number associated with the ATID and the transaction and is required to flow through the NFX Pre-Trade Risk Management (PTRM) system. If Tag 1 is not populated with a valid FCM account number, the transaction will be rejected.

### 7.2 CREATING AN ACCOUNT

1. On the **Accounts** menu, click **New Account**.
2. Search by Customer name and select the Customer for that account.



## Account Information

2. Assign the account a number in the **FCM Account Number** field. This will be the account number that will be included in Tag 1 for any the trade message associated with this account.
3. Name the account.
4. In the Sales Series as drop down menu select either Agent or Principal to describe the account type. This is a required field. Do NOT select either BLOCK/EFRP or ATS in this field.
5. Select an account type based on the choices. This is the CTI Code:

**Own Account:** an account for the member (CTI Code 1)

**House Account:** an account for the clearing firm (CTI Code 2)

**Another Member:** an account for another member on the exchange floor (CTI Code 3)

**Customer Account:** an account for any other Customer (CTI Code 4)

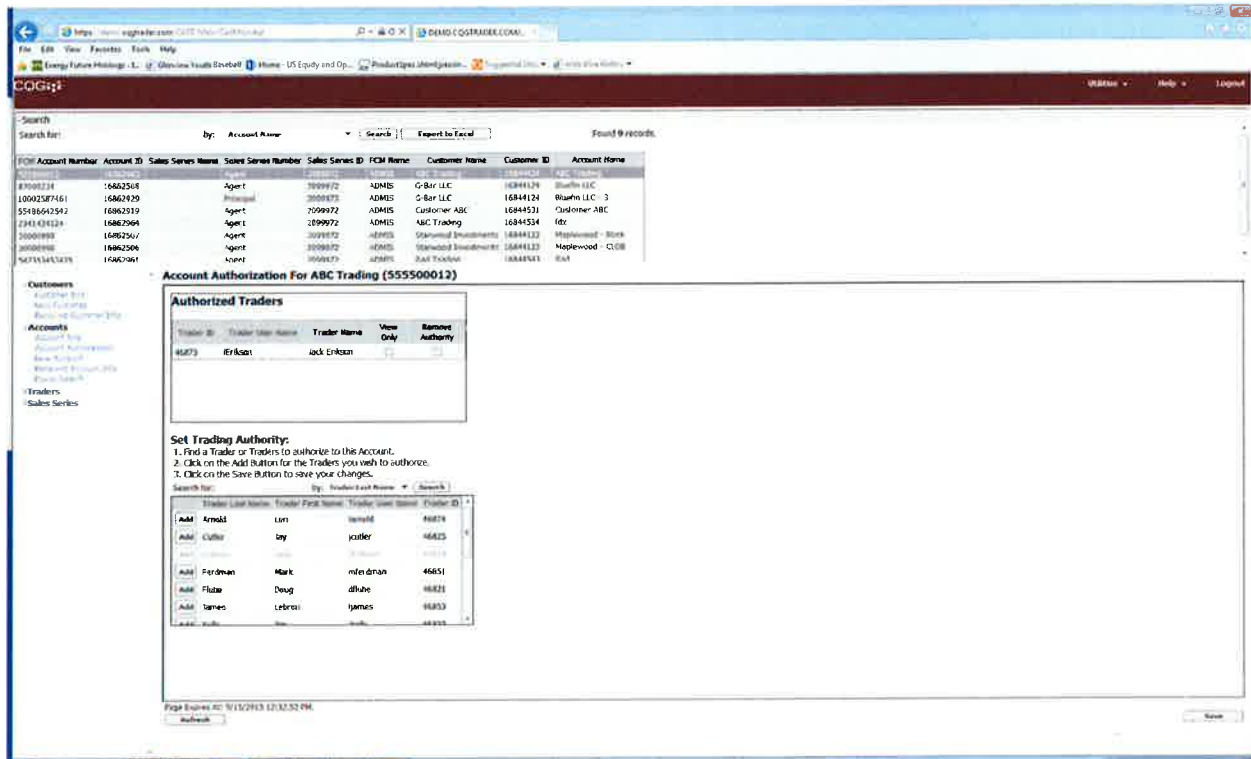
6. The Account Settings and Routing Options are not used by NFX.

7. Click Save.

## 7.3 AUTHORIZING A TRADER FOR AN ACCOUNT

1. On the **Accounts** menu, click **Account Authorization**.
2. Search and select the account for which you wish to authorize traders.
3. Search for the trader or traders that you wish to authorize for the account and **Add** them.
4. Click Save.

Additional traders can be given authorization to any account or multiple accounts as necessary. Trader account authorizations can be removed by selecting the account and clicking Remove Authority for the associated trader and clicking Save.



## 7.4 REMOVING AN ACCOUNT

Only accounts without any Authorized Traders can be removed.

1. On the **Accounts** menu, click **Account Info** or **Group Account Info**.
2. Click the **Remove** button.
3. Click **OK** on the confirmation message.

## 8 AVAILABILITY OF NFX CAST INFORMATION IN TRADING SYSTEM

It is important to note that NFX CAST does not include a direct connection to the NFX Trading System. Information submitted to NFX CAST is updated only once per business day at 3PM EPT (Daily CAST Update). All NFX CAST updates entered prior to the 3PM EPT cutoff will be processed and uploaded to the NFX System prior to start of the next trading session (6:45PM EPT that same business day). Information submitted after 3PM EPT will NOT be included in the Daily CAST Update and will NOT be included in the NFX Trading System until 6:45 PM EPT THE FOLLOWING BUSINESS DAY.

For example, if an FCM enters updates to NFX CAST prior to 3PM EPT on Tuesday, the updates will be processed by NFX and effective by Tuesday evening prior to the 6:45PM EPT Pre-open session for Wednesday's Trading Session. Updates entered into NFX CAST after 3PM EPT on Tuesday, will not be processed by NFX and effective until Wednesday, prior to the 6:45PM EPT Pre-open session for Thursday's Trading Session.

NFX CAST Info Submission	Daily NFX Cast Update Cutoff Time	NFX CAST Info Effective
Tuesday prior to 3PM ET	3PM ET Tuesday	6:45PM Tuesday
Tuesday after 3PM ET	3PM ET Wednesday	6:45PM Wednesday

It is each FCM's responsibility to insure that its traders do not trade prior to their required information being effective. Orders or trades with an account number (FIX Tag 1) that is not effective in the NFX Trading System will be rejected. Orders or trades that include an ATID that is not effective in the NFX Trading System will be considered a trade message without an ATID which may lead to disciplinary action.

It is each FCM's responsibility to insure that all necessary Authorized Trader, account, and account authorization info is complete, accurate, and updated. Further it is each FCM's responsibility to insure that all account and Authorized Trader information is correctly submitted on each trade message. Failure to include this information on any trade message will lead to rejected transactions and substantial fines.

## 9 CAST HELP

If you have any questions associated with NFX CAST please contact:

NFX Operations at [NFXOps@nasdaq.com](mailto:NFXOps@nasdaq.com) or

Steve Sladoje

312-568-5903

[steve.sladoje@nasdaq.com](mailto:steve.sladoje@nasdaq.com)