July 25, 2018 Nasdaq Futures, Inc.

FMC Tower, Level 8,

Christopher J. Kirkpatrick 2929 Walnut Street

Office of the Secretariat Philadelphia, PA 19104 / USA

Commodity Futures Trading Commission

Three Lafayette Center business.nasdaq.com/futures

1155 21st Street, NW

Washington, DC 20581

**Rule Self-Certification: Amendment to Block Trade Thresholds for**

**Dry Freight Futures and Options Contracts**

**Reference File: SR-NFX-2018-36**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (“Act”), and Section 40.6 of the Commission’s regulations thereunder, NASDAQ Futures, Inc. (“NFX” or “Exchange”) hereby submits rules relating to block trade minimum quantity thresholds for NFX Dry Freight Futures and Options contracts (“Dry Freight contracts”). The Exchange anticipates the new rules going into effect beginning August 8, 2018, for trade date August 9, 2018.

The rule amendments proposed herein are attached to this letter in Exhibit A which amends Rulebook Appendix A, Listed Contracts.

**Exhibit 1 - Amendments to Rulebook Appendix A, Listed Contracts**

Block Trade Minimum Quantity Threshold and Reporting Times. NFX launched the Dry Freight contracts on July 4, 2018. When the new contracts were certified to the Commission NFX included a rule for each contract allowing NFX to submit block trades in the Dry Freight contracts with a block trade minimum threshold of one contract. This rule was added in order to allow the migration of positions in the Dry Freight contracts that had previously been listed on Nasdaq Commodities Europe to NFX. On July 12, 2018, NFX completed the migration of Dry Freight contracts from the Nasdaq Commodities Europe platform. Now that the migration is complete, NFX is amending the rules for the Dry Freight contracts to remove the provision allowing NFX to submit block trades with a one contract minimum threshold.

**DCM Core Principles**

The Exchange has reviewed the designated contract market core principles (“Core Principles”) as set forth in the Act in connection with the amendments presented herein. Consistent with Core Principle 7 - Availability of General Information, the Exchange will post general information, including the NFX Rulebook as amended herein, on its website: [business.nasdaq.com/futures](http://business.nasdaq.com/nasdaq-futures/nfx-market).

**Certifications**

There were no opposing views among NFX’s Board of Directors, members or market participants. The Exchange hereby certifies that the rule amendments set forth herein comply with the Act and the Commission’s regulations thereunder. The Exchange also certifies that notice of pending certification and a copy of this submission have been concurrently posted on the Exchange’s website at [business.nasdaq.com/futures](http://business.nasdaq.com/nasdaq-futures).

If you require any additional information regarding the submission, please contact Aravind Menon at (301) 978-8416 or aravind.menon@nasdaq.com. Please refer to SR-NFX-2018-36 in any related correspondence.

Regards,



Rick Beaman

Chief Executive Officer

Attachments:

Exhibit A: Amendments to Rulebook Appendix A – Listed Contracts