**Rule Self-Certification**

September 17, 2018

Christopher J. Kirkpatrick

Office of the Secretariat

Commodity Futures Trading Commission

Three Lafayette Center

1155 21st Street, NW

Washington, DC 20581

Re: **Rule Certification for Amendments to the**

 **NFX Fee Schedule**

 **Reference File: SR-NFX-2018-42**

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”) is amending its fee schedule to introduce a fee rebate for spread transactions in certain dry freight contracts.

These changes will become effective on October 1, 2018. The corresponding amendment is contained in Exhibit A below.

The fee rebate, which will be available until December 31, 2018, is to help facilitate market participants migrating their open interest from the NFX SM6TC Supramax 6 T/C Average Financial Futures (SM6Q) contract to the NFX SM10TC Supramax 10 T/C Average Financial Futures (S10Q) contract (and corresponding NFX Options on NFX SM6TC Supramax 6 T/C Average Financial Futures (S6Q) contract to the NFX Options on NFX SM10TC Supramax 10 T/C Average Financial Futures (S0Q) contract) following the Baltic Exchange's adjustment in how it calculates the Baltic Supramax Time Charter Index. A similar step is being taken by other exchanges that list the Supramax Time Charter Average 6 and 10 route freight contracts.

The Exchange will offer the rebate on both the Transaction Fees charged by NFX, and the clearing fee charged by The Options Clearing Corporation.

**DCM Core Principles**

The Exchange believes the fee schedule amendments are consistent with Designated Contract Market (“DCM”) Core Principles. The Exchange will publish the amended fee schedule on its website to ensure that market participants have been advised of the changes. The Exchange believes the temporary fee rebate for certain spread transactions is reasonable and continues the Exchange’s goal of offering liquidity to the marketplace.

The Exchange believes that the amendment complies with Core Principle 4 (Monitoring of Trading), Core Principle 9 (Execution of Transactions) and Core Principle 12 (Protection of Market Participants). The fee rebate will not impact order execution priority or otherwise give participants any execution preference or advantage. The rebate will not impact the Exchange’s ability to perform its trade practice and market surveillance obligations under the Act and Exchange staff will monitor trading by market participants to prevent manipulative trading and market abuse. Additionally, the Exchange has systems to track program participants’ volume to ensure proper distribution of earned incentives. Finally, NFX rules include prohibitions against fraudulent, non-competitive, unfair or abusive practices.

The Exchange has reviewed the designated contract market 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 amendments to the fee schedule set forth herein complies 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/nfx-market).

If you require any additional information regarding this submission, please contact Stephen Matthews at (301) 978-8458 or steve.matthews@nasdaq.com. Please refer to SR-NFX-2018-42 in any related correspondence.

Regards,



Rick Beaman

Chief Executive Officer

Attachments:

Exhibit A: Amended Fee Schedule effective October 1, 2018