



NASDAQ Futures, Inc.
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Rule Self-Certification

September 29, 2017

Christopher J. Kirkpatrick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Center
1155 21st Street, NW
Washington, DC 20581

Re: **Implementation of Modifications to the NFX Trading System**
Reference File: SR-NFX-2017-40

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 (“CFTC” or the “Commission”) under the Act, Nasdaq Futures, Inc. (“NFX” or “Exchange”) amends its Rules at Chapter I, Chapter IV and Appendix A of the Rulebook. The amendments address updated functionality of the NFX Trading System to allow for Strip, Quarterly Strip Spread, Strip Calendar Spread and Calendar Day Orders. These new order types are being adopted in response to market demand. Additional amendments inform market participants that Implied Order functionality will not be available with the new order types. This rule change will be implemented on October 13, 2017 for trade date October 15, 2017. The text of the amended rulebook is set forth in the attached Exhibit A.

Updated Functionality

Chapter I: Definitions

Linked Orders

The Exchange is removing Linked Orders as a possible order type from the Trading System. Linked Orders have not been used by NFX market participants since the Exchange’s launch. NFX will consider re-activating Linked Order functionality should market conditions dictate its necessity.

Chapter IV: Trading System

NFX is amending its Trading System to allow for additional order types. The new order types will allow NFX participants to have greater flexibility in executing their trading strategy.

Quarterly Strip

NFX is amending its Trading System to allow for the submission of Quarterly Strips. Quarterly Strip orders allow for the simultaneous purchase or sale of three sequential contracts. The execution price for the transaction will be the average price of all contracts traded.

Strip Orders

Strip Orders allow for the simultaneous purchase or sale of a minimum of five and maximum of twelve sequential Futures contracts. The execution price for the transaction will be the average price of all contracts traded.

Strip Calendar Spreads

Strip Calendar Spreads allow for the simultaneous purchase and sale of two individual Strip Orders. The execution price will equal the net price of the two individual Strip Orders.


Calendar Day Orders

Calendar Day Orders allow for the purchase or sale of the exact number of calendar days, in the respective contract month, of the NFX Henry Hub Natural Gas Financial Futures - 2,500 (NNQ).

There were no opposing views among the Exchange's Board of Directors, members or market participants. The Exchange hereby certifies that the amendments to Chapter I, Chapter IV and Appendix A of the Rulebook comply 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 business.nasdaq.com/futures.

If you require any additional information regarding the submission, please contact Aravind Menon at +1-301-978-8416 or via e-mail at aravind.menon@nasdaq.com. Please reference SR-NFX-2017-40 in any related correspondence.

Regards,



Daniel R. Carrigan
President

cc: National Futures Association

Attachments:

Exhibit A: Amended NFX Rulebook