October 23, 2019 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: Rule Certification to**

**Launch a New Energy Designated Market Maker Program**

**Reference File: SR-NFX-2019-30**

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”) submits this self-certification to extend the Designated Market Maker Program (the “DMM Program”) for energy contracts that the Exchange has listed pursuant to Appendix A of the Exchange Rulebook (the “Contracts”).[[1]](#footnote-1) Effective from November 5, 2019, the DMM Program will operate for a period of six (6) months. The DMM Program was initially filed with the Commission on April 12, 2019.[[2]](#footnote-2) A copy of the initial tender offer submitted to market participants at the program’s inception and a description of the cost of the program is attached as Exhibit A and Confidential Exhibit B, respectively.

The DMM Program was revised and relaunched in April of 2019 to initially focus on NFX Brent Crude Financial Futures (BFQ), other Contracts may be added at a later date. The Exchange believes that the DMM Program complies with Core Principle 4 (Monitoring of Trading), Core Principle 9 (Execution of Transactions) and Core Principle 12 (Protection of Market Participants). The DMM Program does not impact order execution priority or otherwise give participants any execution preference or advantage. The DMM Program does not impact the Exchange’s ability to perform its trade practice and market surveillance obligations under the Act and Exchange staff will monitor trading in the DMM Program’s products 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 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: [business.nasdaq.com/futures](http://business.nasdaq.com/nasdaq-futures/nfx-market).

If you require any additional information regarding this submission, please contact Aravind Menon at (301) 978-8416 or aravind.menon@nasdaq.com. Please refer to SR-NFX-2019-30 in any related correspondence.

Regards,



Kevin Kennedy

Chief Executive Officer

Exhibit A

DMM Program Tender

Confidential Exhibit B

Description and cost estimate for the DMM Program (under separate cover)

1. See [NFX Rulebook Appendix A – Listed Contracts](http://nasdaqphlx.cchwallstreet.com/NASDAQPHLXTools/PlatformViewer.asp?selectednode=chp_1_1_1_9&manual=%2Fnasdaqomxphlx%2Fnfx%2Fphlx-brdtrade-rules%2F) [↑](#footnote-ref-1)
2. See SR-NFX-2019-15, initial filing of the new DMM program in NFX Brent Crude Financial Futures (BFQ). [↑](#footnote-ref-2)