

December 4, 2019

VIA PORTAL

Commodity Futures Trading Commission
Attention: Christopher Kirkpatrick, Secretary
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Re: CFTC Regulation 40.6(a) Certification: Temporary Rule Changes to facilitate the Implementation of the Nodal Exchange / Nasdaq Futures, Inc. ("NFX") Asset Purchase Agreement

Dear Mr. Kirkpatrick:

Nodal Exchange, LLC ("Nodal Exchange" or "Exchange") is notifying the Commodity Futures Trading Commission ("CFTC" or "Commission") that it is self-certifying temporary amendments to the Nodal Exchange Rules to facilitate the implementation of the Nodal Exchange / NFX Asset Purchase Agreement.

REDACTED

Pursuant to Section 5c(c) of the Act and the Commission's Regulation 40.6, the Exchange certifies that the temporary Rule amendments comply with the Act and the Commission's Regulations thereunder. There have not been any opposing views expressed regarding the temporary amendments to the Rules.

Nodal Exchange certifies that a redacted version of this submission has been concurrently posted on the Nodal Exchange website at www.nodalexchange.com.

If you have any question or need additional information regarding this submission, please contact me at 703-962-9853 or Markotic@nodalexchange.com.

Sincerely,

/s/ Max Markotic

Director of Compliance