



August 29, 2024

Submitted via CFTC Portal

Mr. Christopher J. Kirkpatrick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: SpectrAxe LLC – Credit Program

Dear Mr. Kirkpatrick,

Pursuant to Section 5c(c) of the Commodity Exchange Act (Act) and Section 40.6(a) of the regulations of the Commodity Futures Trading Commission (Commission), SpectrAxe LLC (SpectrAxe) hereby submits its Reverse Give Up Credit Program (Credit Program). Attachment A, provided under separate cover, provides the Credit Program. SpectrAxe is requesting confidential treatment of the Credit Program.

The Credit Program will become effective on September 13, 2024, no fewer than ten (10) business days from the date hereof.

In connection with this submission, SpectrAxe hereby notifies the Commission that:

1. SpectrAxe certifies that it has posted a notice of this pending certification with the Commission and a copy of this submission on SpectrAxe's website;
2. SpectrAxe certifies that the Credit Program complies with the Act and the Commission's regulations thereunder; and
3. No substantive opposing views with respect to the Credit Program were expressed to SpectrAxe by its governing board or committee members, members of SpectrAxe or market participants.

If you have any questions regarding this submission, please do not hesitate to contact the undersigned at +1-929-581-0340 or mlee@spectraxe.com.

Respectfully,

A handwritten signature in black ink, appearing to read "mlee", with a horizontal line extending to the right.

Michael Lee
Chief Compliance Officer, Chief Regulatory Officer
SpectrAxe, LLC

Attachment A

SpectrAxe Reverse Give Up Credit Program

(provided under a separate cover)

(CONFIDENTIAL TREATMENT REQUESTED)