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October 3, 2024

VIA CFTC PORTAL

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

**Re: Nodal Exchange Open Interest Program 2: Certification Submission No. 24-039
Pursuant to Regulation 40.6(a)**

Dear Mr. Kirkpatrick:

Pursuant to Commission Regulation 40.6(a), Nodal Exchange, LLC (“Nodal Exchange” or “Exchange”) is notifying the Commission by self-certification of the implementation of the Nodal Exchange Open Interest Program 2. A complete description of the Program is included and segregated as Exhibit 1 for which the Exchange seeks confidential treatment. A redacted version is also included. The program will go into effect on October 21, 2024.

Exchange management has assessed the Program and certifies its compliance with the Commodity Exchange Act (“Act”), including the Commissions Regulations and the Core Principles. Specifically, the Program complies with Core Principle 2 (Compliance with Rules), Core Principle 4 (Prevention of Market Disruption), Core Principle 9 (Execution of Transactions), Core Principle 12 (Protection of Market Participants), and Core Principle 18 (Recordkeeping).

Pursuant to Section 5c(c) of the Act and Commission Regulation 40.6, the Exchange certifies that the Program complies with the Act and the Commission’s Regulations thereunder. There have not been any opposing views expressed regarding the Program.

Nodal Exchange certifies that, concurrent with this submission, a redacted version of the Program was posted on the Nodal Exchange website at www.nodalexchange.com.

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

Sincerely,
/s/ Max Markotic
Managing Director

Attachments:

- Exhibit 1: Nodal Exchange Open Interest Program 2 - CONFIDENTIAL
- Exhibit 2: Nodal Exchange Open Interest Program 2 - REDACTED
- Request for Confidential Treatment