**Rule Self-Certification**

May 29, 2015

Christopher J. Kirkpatrick

Office of the Secretariat

Commodity Futures Trading Commission

Three Lafayette Center

1155 21st Street, NW

Washington, DC 20581

Re: **Regulation §40.6 Certification**

**Amendments to Table of Position Limits, Position**

**Accountability Levels and Large Trader Reporting Levels**

**Reference File: SR-NFX-2015-34**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (“Act”), and Section 40.6 of the regulations promulgated by the Commodity Futures Trading Commission (“Commission”) under the Act, NASDAQ Futures, Inc. (“NFX” or “Exchange”) is substituting spot month position accountability levels for spot month position limits for the following NFX natural gas contracts which the Exchange anticipates listing in the near future, on a date to be announced in an upcoming Futures Regulatory Alert:[[1]](#footnote-1)

|  |  |  |
| --- | --- | --- |
| **Contract Name** | **Rulebook Appendix A Chapter** | **Symbol** |
| NFX Henry Hub Natural Gas Penultimate Financial Futures – 2,500 | 202 | NPQ |
| NFX Henry Hub Natural Gas Penultimate Financial Futures – 10,000 | 204 | HUQ |
| NFX Options on NFX Henry Hub Penultimate Financial Futures – 10,000 | 205 | LNQ |

In addition, the Exchange is also adding clarifying language in the Exchange’s proposed Table of Position Limits Position Accountability Levels and Large Trader Reporting Levels (the “Position Limits Table”) in the column captioned “Initial Spot-Month Limit Effective Date” with respect to NFX Options on Brent Crude Financial Futures (BCQ) and NFX Options on NFX WTI Financial Futures (LOQ). The new language clarifies that the date specified in that column is the initial spot-month limit effective date for the underlying futures contracts into which BCQ and LOQ settle - the NFX Brent Crude Financial Futures (BFQ) and the NFX WTI Crude Oil Financial Futures (CLQ), respectively.

A marked version of the Position Limits Table reflecting the changes described above is attached. (See Exhibit A to SR-NFX-2015-34, *Rulebook Appendix B: Table of Position Limits, Position Accountability Levels and Large Trader Reporting Levels,* attached under separate cover).[[2]](#footnote-2)

With respect to the designated contract market core principles (“Core Principles”) as set forth in the Act:

Core Principle 3 - Contracts not Readily Subject to Manipulation: The Energy Contracts with respect to which changes are made herein will be financially settled, do not involve the physical delivery of commodities, and will settle to prices published on a well-established reference source. The options contracts will be exercised into the relevant Exchange futures contract.

Core Principle 5 - Position Limitations or Accountability: The Exchange's rules at Chapter V, Section 13 set forth the Exchange's policies for monitoring of positions that are owned, controlled or held by any person. The proposed amendments to the Position Limits Table substitute spot month position accountability for spot month position limits for NPQ, HUQ, and LNQ, consistent with spot month position accountability treatment of comparable natural gas contracts that are already in place at an established futures exchange. The clarifying language with respect to BCQ and LOQ is also consistent with language used by another established exchange in its position limits table with respect to comparable contracts.

Core Principle 7 - Availability of General Information: As required by this Core Principle, the Position Limits Table, including the amendments proposed herein, will be posted on the Exchange’s website at [WWW.NASDAQOMX.COM/NASDAQ-FUTURES](http://WWW.NASDAQOMX.COM/NASDAQ-FUTURES).

The Position Limits Table, including the amendments made herein, will be implemented upon the listing of the Energy Contracts, on a date to be announced by the Exchange in a Futures Regulatory Alert. There were no opposing views among the NFX’s Board of Directors, members or market participants. The Exchange hereby certifies that the amendments 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 at [WWW.NASDAQOMX.COM/NASDAQ-FUTURES](http://WWW.NASDAQOMX.COM/NASDAQ-FUTURES).

If you require any additional information regarding the submission, please contact Carla Behnfeldt at (215) 496-5208 or via e-mail at carla.behnfeldt@nasdaq.com. Please reference SR-NFX-2015-34 in any related correspondence.

Regards,

Daniel R. Carrigan

President

Attachment:

Exhibit A Rulebook Appendix B: Table of Position Limits, Position Accountability Levels and Large Trader Reporting Levels (attached under separate cover)

1. See SR-NFX-2015-10 filed March 11, 2015, in which the Exchange proposes to list certain energy futures and futures options (the “Energy Contracts”) on or after June 1, 2015, on a date to be announced by the Exchange through the issuance of a Futures Regulatory Alert [↑](#footnote-ref-1)
2. The changes marked on Exhibit A hereto reflect changes from the Position Limits Table as originally filed on March 11, 2015 in SR-NFX-2015-10. [↑](#footnote-ref-2)