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December 16, 2016

Via CFTC Portal Submissions

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

RE: Rule Certification: Nadex Delists Bitcoin - Submission Pursuant to Commission Regulation §40.6(a)

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (the "Act"), and §40.6(a) of the regulations promulgated by the Commodity Futures Trading Commission (the "Commission") under the Act, North American Derivatives Exchange, Inc. ("Nadex") hereby submits to the Commission its intent to delist its Bitcoin Binary contracts. As §40.6(a) exempts the delisting of a product from the 10-day review period, Nadex will delist its Bitcoin contracts effective at the close of business on trade date Friday, December 16, 2016.

The last Bitcoin contracts will close at their regular time of 3:00pm ET on December 16, 2016. After the final settlement of these contracts, no open positions or working orders will exist in the Nadex Bitcoin market.

Members who have actively traded the Nadex Bitcoin market will be notified of the product delisting by email. A notice is available on the Nadex website which publicly announces the product delisting.

Amendments to the Rulebook to remove Rule 12.20 (Bitcoin Binary Contracts) have been outlined in Exhibit A. Specific amendments are set forth in Exhibit B. Any deletions are stricken out while the amendments and/or additions are underlined.

Nadex hereby certifies that the additions contained herein comply with the Act, as amended, and the Commission Regulations adopted thereunder. No substantive opposing views

were expressed to Nadex with respect to any of these actions. Nadex hereby certifies that notice of these events was posted on its website at the time of this filing.

　　　　Should you have any questions regarding the above, please do not hesitate to contact me by telephone at (312) 884-0927 or by email at jaime.walsh@nadex.com.

　　　　　　　　　　　　　　Sincerely,

　　　　　　　　　　　　　　Jaime M. Walsh
　　　　　　　　　　　　　　Legal Counsel

EXHIBIT A

Rule	Asset	Duration/Close Time	Action	Effective Date
12.20	Bitcoin Binary Contracts	All Daily and Weekly 3:00pm expiration contracts	Delist contracts	End of business on 12/16/2016

EXHIBIT B

Amendment of Rules 12.20

(The following Rule amendments are underlined and deletions are stricken out)

RULES 1.1 – 12.15 [UNCHANGED]

RULE 12.16 – ~~12.19~~ 12.25 [RESERVED]

~~RULE 12.20 BITCOIN BINARY CONTRACTS~~

~~(a) SCOPE – These Rules shall apply to the Class of Contracts referred to as the Bitcoin Binary Contracts issued by Nadex.~~

~~(b) UNDERLYING – The Underlying for this Class of Contracts is the value of the bitcoin digital currency as indicated by the Tera® Bitcoin Price Index, calculated by the TeraExchange®1.~~

~~(c) SOURCE AGENCY – The Source Agency is TeraExchange.~~

~~(d) TYPE – The Type of Contract is a Binary Contract.~~

~~(e) ISSUANCE – For each planned release by the Source Agency of the Underlying, Nadex will issue various Contracts, each of a different Series. A new issuance of Contracts will commence no later than two (2) business days following the Expiration Date.~~

~~(f) PAYOUT CRITERION – The Payout Criterion for each Contract will be set by Nadex at the time the Binary Contracts are initially issued. For the Bitcoin Binary Contract, the Payout Criteria for the Contracts will be set as follows:~~

~~(i) WEEKLY BITCOIN BINARY CONTRACTS~~

~~(1) EXPIRATION TIME – 3:00PM ET CLOSE~~

~~(2) STRIKE INTERVAL WIDTH – The interval width between each strike level shall be 8.~~

~~(3) NUMBER OF STRIKE LEVELS LISTED - Fifteen (15) strike levels will be listed for the Weekly Bitcoin Binary Contract Series.~~

~~(4) STRIKE LEVELS GENERATED - Strike levels will be generated such that Binary Contract "W" is valued 'at-the-money' in relation to the Underlying market as determined by the Source Agency, immediately before the issuance~~

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[1] TeraExchange® and Tera® Bitcoin Price Index are service and trademarks of Tera Advanced Technologies, LLC.

of these Contracts, and shall be measured in U.S. cents rounded to the nearest one (1). Seven (7) strike levels will be generated above Binary Contract W at an interval of eight (8), and seven (7) strike levels will be generated below Binary Contract W at an interval of 8 (e.g. W – 8; W; W + 8). The Contract will have a Payout Criterion of greater than the strike level value.

(ii) DAILY BITCOIN BINARY CONTRACTS

(1) EXPIRATION TIME – 3:00PM ET CLOSE

(2) STRIKE INTERVAL WIDTH – The interval width between each strike level shall be 2.

(3) NUMBER OF STRIKE LEVELS LISTED - Twenty-seven (27) strike levels will be listed for the Daily Bitcoin Binary Contract Series.

(4) STRIKE LEVELS GENERATED - Strike levels will be generated such that Binary Contract "X" is valued 'at-the-money' in relation to the Underlying market as determined by the Source Agency, immediately before the issuance of these Contracts, and shall be measured in U.S. cents rounded to the nearest 0.5. Thirteen (13) strike levels will be generated above Binary Contract X at an interval of 2, and thirteen (13) strike levels will be generated below Binary Contract X at an interval of 2 (e.g. X – 2; X; X +2). The Contract will have a Payout Criterion of greater than the strike level value.

(iii) Nadex may list additional Bitcoin Binary Contracts with different ranges of Payout Criteria on a discretionary basis in accordance with the CEA and Commission Regulations.

(g) MINIMUM TICK – The Minimum Tick size for the Bitcoin Binary Contracts shall be $0.25.

(h) POSITION LIMIT – The Position Limit for the Bitcoin Binary Contracts shall be 2,500 Contracts.

(i) LAST TRADING DATE – The Last Trading Date in a Series is the same date as the Expiration Date.

(j) SETTLEMENT DATE – The Settlement Date in a Series is the same date as the Expiration Date.

(k) EXPIRATION DATE – The Expiration Date of the Contract will be the date on which the Bitcoin Expiration Value is released by the Source Agency.

(l) SETTLEMENT VALUE – The Settlement Value is the amount paid to the holder of the in-the-money Contract on the Settlement Date. The Settlement Value of an in-the-money Bitcoin Binary Contract is $100.

~~(m) EXPIRATION VALUE — The Expiration Value is the price or value of the bitcoin released by the Source Agency on the Expiration Date. The Expiration Value will be the last bitcoin value just prior to the close of trading of the Bitcoin Binary Contract as reported by the Tera Bitcoin Price Index, calculated by TeraExchange.~~

~~(n) CONTINGENCIES — If no daily settlement price of the relevant Tera Bitcoin Price Index is announced by the Source Agency, the Settlement Date will be delayed until such settlement price for that Series is released and publicly available.~~

~~RULE 12.21 – 12.25 [RESERVED]~~

RULES 12.26 – 12.78 [UNCHANGED]

End of Rulebook.

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