

Rule Self-Certification

July 1, 2009

Office of the Secretary
Commodity Futures Trading Commission
Three Lafayette Center
1155 21st St., N.W.
Washington, D.C. 20581

C.F.T.C.
OFFICE OF THE SECRETARIAT
2009 JUL 1 PM 3 21

Re: IDEX SwapDrop Platform – EFS Transactions
Reference File SR-NFX-2009-09

Ladies and Gentlemen:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (the “Act”), and Section 40.6 of the regulations promulgated by the Commodity Futures Trading Commission under the Act, the NASDAQ OMX Futures Exchange (“NFX” or “Exchange”) hereby submits amendments to Exchange Rule F8, IDEX SwapDrop Platform - EFS Transactions. The amendments will become effective on Monday, July 6, 2009.

There were no opposing views among NFX’s Board of Directors, members or market participants. NFX hereby certifies that the attached amendments comply with the Commodity Exchange Act and the Commission’s regulations thereunder.

Regards,



Daniel R. Carrigan
Senior Managing Director

cc w/att: Mr. Glenn Swann
Mr. J. Goodwin

New language is underlined; deletions are struck through

Rule F8. IDEX SwapDrop Platform - EFS Transactions

An exchange of futures for, or in connection with, a swap ("EFS") consists of two discrete and related, transactions; a swap transaction and a futures transaction involving a Contract between two parties. At the time the transaction is effected the buyer and seller of Contract must be, respectively, the seller and buyer of the swap agreement. The swap agreement component of the EFS transaction shall involve the economically equivalent interest rate swap instrument underlying the Exchange-listed Contract.

The IDEX SwapDrop Platform is hosted by the Exchange for the purpose of facilitating the submission of EFS transactions involving the exchange of privately negotiated over-the-counter interest rate swap agreements for Exchange-listed Contracts.

All Contracts are eligible for EFS transactions. All EFS transactions must comply with the following terms and conditions:

(a) Transaction Requirements

(i) Both the buyer and the seller of the bilateral over-the counter swap agreement must be "eligible contract participants" as defined in the Commodity Exchange Act, as amended.

(ii) The quantity covered by the swap agreement must be approximately equivalent to the quantity covered by the Contract or a number of Contracts.

(iii) Any Member or Member Organization participating in an EFS transaction shall create, maintain and provide the Exchange with such documents and information with respect thereto, including confirmation statements evidencing the entering into the swap agreement between the parties, as the Exchange or its agents may request. Members, Member Organizations and Customers must retain and provide upon request appropriate documentation relating to the privately negotiated over-the -counter swap agreement component of each EFS transaction.

(iv) For an EFS to be bona fide, both ~~legs~~ components must be bona fide.

(b) Reporting Requirements

(i) The parties to an EFS transaction shall cause the transaction to be reported by an Authorized Trader or Authorized Submitter to the Exchange through the IDEX SwapDrop Platform in accordance with such time frames and procedures as determined by the Exchange from time to time. The IDEX SwapDrop Platform may be accessed at www.swapdrop.com.

(ii) If both parties to a pre-existing portfolio of bilateral swap agreements (which portfolio may consist of one or more than one bilateral swap agreements) wish to replace such bilateral swap agreements with Exchange-listed and cleared Contracts through the reporting of an EFS transaction to the Exchange, provided that the portfolio of bilateral swap positions has been submitted to the Clearinghouse for prior review and the Clearinghouse agrees in advance that it will accept for clearing the futures components of the proposed EFS transaction related to such portfolio, Authorized Traders and Authorized Submitters may report such portfolio of EFS transactions in written form to staff of the Exchange during hours the Exchange is open for trading for reporting into the IDEX SwapDrop Platform. This method of reporting EFS transactions is solely for the convenience of Authorized Traders and Authorized Submitters and shall be known as "Portfolio Loading". In order to report EFS transactions for Portfolio Loading, Authorized Traders and Authorized Submitters must provide staff of the Exchange in written form all the information required to be provided pursuant to Rule F12(c) including the Member ID of the Clearing Member, the Trader ID for the Authorized Trader submitting the EFS transaction, or for the Authorized Submitter reporting the EFS transaction, the Contract, buy or sell, price, quantity, Customer Type Indicator (or "CTI" code) as prescribed by Commission regulation, Customer Account identifier and Origin Code. Reporting of EFS transactions for Portfolio Loading shall constitute reporting of EFS transactions to the IDEX SwapDrop Platform for purposes of these rules. Under no circumstances shall the Exchange or the Clearinghouse be liable for any damages resulting from or relating to delays by, or errors made by, Exchange or Clearinghouse staff in entering EFS transactions into the IDEX SwapDrop Platform.

(c) No Change.