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By Electronic Mail

October 15, 2008

Mr. David A. Stawick
Secretary
Commodity Futures Trading Commission
1155 21st Street NW
Washington DC 20581

Re: 2008-101 NYSE Liffe, LLC - Notice 12/2008 Changed Guidance on Submission of Large Trader Reports pursuant to NYSE Liffe Rule 419

Dear Mr. Stawick:

I write in accordance with the provisions of Commodity Futures Trading Commission ("Commission") Rule 40.6 providing for the self-certification of exchange rules. Specifically, this letter advises the Commission that NYSE Liffe, LLC ("NYSE Liffe" or "Exchange") has issued a Notice to Members No. 12/2008 (the "Notice"), setting forth changes in the submission of Large Trader Reports pursuant to NYSE Liffe Rule 419, effective for the November 3, 2008 trading session, which is the first trading session in November 2008.

The Commission's order dated August 21, 2008 granting NYSE Liffe Designated Contract Market status was subject to the Exchange's representations that "the necessary software modifications will be completed such that all firms will be in a position to submit large trader reports to the Commission using the NYSE Liffe code no later than the end of October 2008." Prior to the launch of the Exchange on September 8, 2008, NYSE Liffe issued Notice 3 setting forth guidance for Members to comply with their regulatory reporting obligations pursuant to NYSE Liffe Rule 419. Consistent with the Commission's order, NYSE Liffe has issued the Notice setting forth the changes to the guidance provided in Notice 3 necessary for Members to meet their regulatory reporting obligations under NYSE Liffe Rule 419.

I enclose a submission cover sheet in accordance with the instructions in Appendix D to Part 40 of the Commission's rules. CFTC Rule 40.6(a)(3)(i).

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A copy of the Notice setting forth the changes in the submission of Large Trader Reports is enclosed. CFTC Rule 40.6(a)(3)(ii).

The new submission process will be used commencing with the November 3, 2008 trading session, which begins on Sunday, November 2, 2008, the effective date of the Notice. CFTC Rule 40.6(a)(3)(iii).

NYSE Liffe has received no substantive opposing views. CFTC Rule 40.6(a)(3)(iv).

NYSE Liffe hereby confirms that the change in Large Trader Report submission process set forth in the Notice and the Notice itself comply with the Commodity Exchange Act and the Regulations thereunder. CFTC Rule 40.6(a)(3)(v).

If you have any questions, please call me at (212) 656-4568.

With best regards,



Karl D. Cooper
Chief Regulatory Officer
Enclosures



NYSE LIFFE NOTICE No. 12/2008

ISSUE DATE: October 15, 2008
EFFECTIVE DATE: November 3, 2008

NYSE Liffe – Change to submission method for Large Trader Reporting

Executive Summary

The purpose of this Notice is to advise members about changes to the transmission method associated with the submission of Large Trader Reports.

1. Introduction

- 1.1 NYSE Liffe Notice No. 3/2008, issued August 29, 2008, informed Members of the transmission methods associated with all NYSE Liffe Regulatory reports. This Notice updates Members of changes to the Large Trader Reporting process going forward effective for trade date November 3, 2008.

2. Large Trade Position Reports

- 2.1 In migrating the precious metals contracts from the Chicago Board of Trade (CBOT) to NYSE Liffe, CME Group agreed, and the CFTC's order granting NYSE Liffe Designated Contract Market status provided, that, until the end of October 2008, Large Trader Reports for those accounts that hold reportable positions in the NYSE Liffe precious metals contracts could continue to be reported to the CFTC and to the CBOT within the overall Large Trader Reports filed in relation to CBOT business. This meant that, until the end of October 2008, Members did not need to make changes to the timing of filing, to the format of the reports or to the structure of their current Large Trader Report mechanisms. During this time, CME Group has agreed to extract the relevant precious metals contracts and forward the information to NYSE Liffe for surveillance purposes.
- 2.2 From the commencement of trading on November 2, 2008 (for trade date November 3, 2008), all members must redirect their Large Trader Report submissions from the CBOT to the new NYSE Liffe staging servers.
- 2.3 The format of the files that members use in their current Large Trader Report mechanism will be retained. The only items that will be changed effective trade date November 3, 2008 will be the destination of the reports and the exchange identifier referenced in the report.
- 2.4 The IP addresses associated with the new NYSE Liffe staging servers are 156.48.250.86 and 156.48.255.86. These IP addresses can be reached via the internet. Members should send the Large Trader Reports to both staging servers.

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- 2.5 As part of the migration to the new staging servers, a new exchange identifier will be used for NYSE Liffe. The new exchange identifier to be used is 04.
 - 2.6 All Clearing Members of NYSE Liffe will receive new user IDs and passwords to be used in the submission of these reports to the new NYSE Liffe staging servers. A NYSE Liffe representative will begin contacting firms the week of October 13 to confirm new account information.
 - 2.7 To support the migration, NYSE Liffe servers will be available to accept the Large Trader Reports for test purposes from October 15 to October 31. During the test period, the Large Trader Reports must continue to be sent to the CBOT and the CFTC in their current form.
 - 2.8 NYSE Liffe has been working with the various suppliers of back office software to ensure that changes are made to their applications in a timely manner. It is recommended that all affected Members contact their respective software suppliers to confirm when the changes will be made to their internal software such that they will be able to communicate with the NYSE Liffe staging servers.

No Change to CFTC Form 102 Submissions

- 3.1 All CFTC Form 102s for accounts that become reportable in NYSE Liffe contracts after September 8, 2008 should continue to be submitted to the NFA, as set forth in NYSE Liffe Notice 3/2008, in the format prescribed by the CFTC, within one day of the position becoming reportable, either by fax to (312) 559-3548 or by email to mktsvl@nfa.futures.org.

For further information in relation to this Notice, Members should contact the following:

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Administration	(+1) 866 592 2693	NLmarketervices@nyx.com
New York Office	1 212 656 4300	nyseليفة@nyx.com
Chicago Office	1 312 442 7730	nyseليفة@nyx.com