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## By Electronic Mail

December 13, 2013

Ms. Melissa Jurgens
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21<sup>st</sup> Street, N.W.
Washington, D.C. 20581

Re: NYSE Liffe US Submission- 2013- 132 Notice Announcing Renewal of General Designated Market Maker Program for GCF Futures

Dear Ms. Jurgens:

I am a Senior Vice-President of NYSE Liffe US LLC ("NYSE Liffe US" or the "Exchange"). Pursuant to Section 5c(c) of the Commodity Exchange Act, as amended (the "Act"), and U.S. Commodity Futures Trading Commission (the "Commission") Regulations (the "Regulations") Section 40.6(a), I enclose a Cover Sheet for NYSE Liffe US Submission 2013-132 and NYSE Liffe US Notice 35/2013 which announces the renewal of the General Designated Market Maker Program for GCF Futures ("General DMM Program") effective with the January 1, 2014, trading session.

NYSE Liffe US hereby certifies that: (i) the General DMM Program complies with the Act and the Regulations and (ii) a notice and copy of this submission is being concurrently posted on the Exchange's web site. Additionally, a concise explanation and analysis of the General DMM Program and its compliance with applicable provisions of the Act, including core principles and the Regulations, is attached. No substantive opposing views were expressed by members or others with respect to the market maker program.

If you have any questions, please call me at (212) 323-8880.

Yours Truly,

Marco Bianchi Enclosures

# Designated Contract Market Core Principles Implicated by NYSE Liffe US Submission 2013-132

CORE PRINCIPLE	ANALYSIS
Core Principle 2: Compliance with Rules	The Exchange has carefully vetted all participants in the General DMM Program. All participants are subject to a market making agreement by which each participant agrees to abide by the Act and all rules, regulations, orders and interpretations of the CFTC and any applicable self-regulatory organization. In addition, the Exchange has the right to terminate the agreement immediately if the membership or trading rights of any market maker are suspended or if, in the opinion of the Exchange's Market Regulation Department, the market maker's activity violates any applicable law or rule. Moreover, each participant agrees to not only comply with the requirements of the program, but also all existing rules of the Exchange including Chapter 3, governing access to the Exchange including Chapter 3, governing access to the Exchange including Platform, Chapter 6 governing the business conduct of Exchange members and prohibiting, among other things, fraudulent acts, fictitious and pre-arranged trades, market manipulation, disruptive trading and acts inconsistent with just and equitable principles of trade. The Exchange monitors its markets on a constant basis in real-time. In addition, through the operation of a regulatory services agreement, the National Futures Association provides to the Exchange comprehensive trade practice and market surveillance services designed to detect activities that are not in compliance with the Act, CFTC Rules, or Exchange rules and policies. Additionally, the Exchange has the authority, through Chapter 7 of the Exchange's rulebook, and the capacity to investigate any possible rule violations and, where appropriate, bring disciplinary actions and impose sanctions for any violations. Finally, the Exchange has in place effective international information sharing arrangements and has entered into accords such as the International Information Sharing Agreement and Memorandum of Understanding and the
Core Principle 3: Contracts not Readily Subject to Manipulation	Intermarket Surveillance Group Agreement.  The program does not incentivize manipulative or other abusive practices. In the Exchange's experience, programs of this type have not promoted abusive practices by participants. Further, the Exchange has policies and procedures to monitor the participants and trading in GCF Futures and to detect and prevent manipulative or abusive trading and practices.

CORE PRINCIPLE	ANALYSIS
Core Principle 4: Prevention of Market Disruption	Trading by participants in the program, like all trading in GCF Futures, will be subject to the existing trade practice and market surveillance policies and procedures of the Exchange. As stated above, the Exchange has real-time surveillance capabilities involving both human interaction as well as technological tools. Furthermore, the Exchange staff, in coordination with National Futures Association, has the capacity to detect and respond to manipulation and price distortions in its market and the ability to provide accurate and complete trade reconstruction.
Core Principle 5: Position Limits or Accountability	Participants in the program will be subject to all applicable position accountability levels.
Core Principle 9: Execution of Transactions	Market maker programs are designed to enhance the market, providing liquidity and requiring consistent, tighter markets that tend to promote more accurate price discovery. Furthermore, the Exchange will, as it does for all such programs, monitor the impact, if any, that this particular program has on trading on the centralized market and, in the event the Exchange identifies any deleterious effect to the centralized market, will take appropriate action.
Core Principle 10: Trade Information	The Exchange records and maintains an audit trail with all trade information regarding trading by all market participants, including the participants in the program, necessary to monitor for customer and market abuse.
Core Principle 12: Protection of Markets and Market Participants	Participants in the program remain subject to all of the Exchange's rules. Chapter 6 of the Exchange's rulebook governs the business conduct of Exchange members and prohibits, among other things, fraudulent acts, fictitious and pre-arranged trades and other activities that could disadvantage their customers, as well as disruptive trading and acts detrimental to the Exchange and inconsistent with just and equitable principles of trade. The Exchange monitors for and investigates any possible rule violations and where appropriate brings disciplinary actions and imposes sanctions for any violations by any participants in these programs.
Core Principle 19: Antitrust Considerations	The program will not result in any restraint of trade as it puts no restrictions on trading in other competing markets and venues.



# NYSE LIFFE US NOTICE No. 35/2013

ISSUE DATE: EFFECTIVE DATE: December 13, 2013 January 1, 2014

#### Renewal of General Designated Market Maker Program for GCF Futures

#### Summary

This Notice announces the renewal of the General Designated Market Maker Program ("General DMM Program") in Futures on DTCC GCF Repo Index® Products.

#### 1. Introduction

- 1.1 NYSE Liffe US Notice No. 47/2012 announced the appointment of market makers ("MMs") to participate in the Exchange's General DMM Program in Futures on DTCC GCF Repo Index® Products ("GCF Futures") commencing with the January 16, 2013 Trading Session and continuing through the June 28, 2013 Trading Session.
- 1.2 NYSE Liffe US Notice No. 13/2013 announced the renewal of the Exchange's General DMM Program in Futures on DTCC GCF Repo Index® Products ("GCF Futures") commencing with the July 1, 2013 Trading Session and continuing through the December 31, 2013 Trading Session.

### 2. Renewal of Designated Market Maker Program

- 2.1 The Exchange has determined to renew the General DMM Program in GCF Futures for a new term, with no changes to its terms and conditions, commencing January 1, 2014 and continuing through June 30, 2014.
- 2.2 All DMM appointments are subject to the terms of a contractual agreement between the Exchange and each DMM. Under the terms of the agreements, each DMM represents that its market making activity will comply with all applicable provisions of the Commodity Exchange Act, the rules and regulations of the Commodity Futures Trading Commission and the Rules of the Exchange. The Exchange will monitor each DMM's performance of market making activity under the contract and may adjust benefits otherwise due under the agreement and/or terminate the agreement if it determines the DMM has failed to perform its obligations as a DMM under the agreement.

Members who have questions or seek additional information in respect of this Notice should contact:

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