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April 16, 2014

VIA EMAIL (submissions@cftc.gov)

Commodity Futures Trading Commission
Attention: Melissa Jurgens, Secretary
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Re: CFTC Regulation 40.6(a) Certification: Submission of Amendment to Rule 4.8 of the Nodal Exchange Rulebook

Dear Ms. Jurgens:

Nodal Exchange, LLC ("Nodal Exchange" or "Exchange") is notifying the Commodity Futures Trading Commission ("CFTC" or "Commission") that it is self-certifying amendments to Rule 4.8 ("Position Transfers") of the Nodal Exchange Rulebook pursuant to Commission Regulation 40.6(a). The amended Rule 4.8 is attached hereto, indicating the specific text that is being added for these amendments. The Exchange intends to implement the amended Rules in 10 business days on April 30, 2014.

The amendments provide additional information and increased clarity of the Exchange's Rules regarding position transfers. The amendments add a provision to require the Exchange's participants submit an application to the Exchange in order to request a transfer involving a change in ownership. There are two added provisions. The first added provision allows the Exchange to approve transfers pursuant to the Rule under certain circumstances involving a merger, asset purchase, consolidation, or other similar non-recurring corporate transaction. The second added provision clarifies that the Exchange may permit a transfer where it is determined that the situation so requires and such transfer is in the best interests of the Exchange.

Exchange management has assessed the amendments to Rule 4.8, and their compliance with applicable provisions of the Commodity Exchange Act ("Act"), including the Commissions Regulations and the Core Principles. Nodal Exchange

has identified that amended Rule 4.8 may affect the following Core Principles as follows:

Core Principle 2 - Compliance with the Rules: Consistent with the Exchange's Rules, the amendments to Rule 4.8 provide additional information to ensure compliance with Exchange Rules. The amendment to Rule 4.8 requires the Exchange's participants to provide information necessary to ensure that position transfers comply with the Exchange's Rules.

Core Principle 9 - Execution of Transactions: Core Principle 9 expressly permits a designated contract market ("DCM") to authorize position transfers for bona fide business purposes. Pursuant to the Commission's authority granted to DCMs, the amendments to Rule 4.8 will increase the clarity of the Rules by providing a process for the Exchange to obtain information and approve transfers under certain circumstances pursuant to the Rule.

Pursuant to Section 5c(c) of the Act and the Commission's Regulation 40.6, the Exchange certifies that amended Rule 4.8 comply with the Act and the Commission's Regulations thereunder. There have not been any opposing views expressed regarding the amendments to Rule 4.8.

Nodal Exchange certifies that this submission has been concurrently posted on the Nodal Exchange website at www.nodalexchange.com.

If you have any question or need additional information regarding this submission, please contact me at 703-962-9835 or Herrera@nodalexchange.com.

Sincerely,



Anita Herrera
Chief Regulatory Officer

Attachments:

Submission Cover Sheet

Redline of Nodal Exchange Rule 4.8

4.8 Position Transfers

4.8.1 Position Transfer Process

The Exchange may permit transfer trades to move positions between ITM accounts or Clearing Member accounts for administrative purposes (“Position Transfers”) where no change in ownership is involved. Participants and Clearing Members must obtain approval from the Exchange for a Position Transfer; such approval to be granted at the sole discretion of the Exchange. Position Transfers will not contribute to any reported volume, price, or trading range.

4.8.2 Transfer of Positions With Change in Ownership

The Exchange may permit the transfer of positions that involves a change in ownership when the proposed transfer is in connection with, or as a result of, a merger, asset purchase, consolidation, or other similar non-recurring corporate transaction between Participants where one or more of the Participants become the successor in interest to one or more other Participants. Participants must apply for and obtain prior written approval from the Exchange; such approval to be granted at the sole discretion of the Exchange. The transferred trades must be indicated as transfers that will not contribute to any reported volume, price, or trading range.

The Exchange may, with the consent of the Clearing Member(s) involved, permit the transfer of existing trades if, in the opinion and sole discretion of the Exchange, the situation so requires and such transfer is in the best interests of Nodal Exchange.