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December 24, 2013

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 6.5.7 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 an amendment to Rule 6.5.7 (Spread or Arbitrage Positions) of the Nodal Exchange Rulebook pursuant to Commission Regulation 40.6(a). The amended Rule 6.5.7 is attached hereto, indicating the specific text that is being deleted and added for this amendment. The Exchange intends to implement the amended Rule 6.5.7 in 10 business days on January 9, 2014.

Specifically, Rule 6.5.7 explains the process for Exchange participants to exclude qualifying spread and arbitrage positions from Exchange-set position limits. The amendment to Rule 6.5.7 includes instructions for Participants to submit either a notice or application providing specific information to the Exchange in order for qualifying spread and arbitrage positions to be excluded from position limits. Exchange management has assessed the amendments to Rule 6.5.7 and its 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 6.5.7 may affect the following Core Principles as follows:

Compliance with the Rules: Consistent with the Exchange's Rules, the amendments to Rule 6.5.7 provide a process for documenting specific information regarding

spread or arbitrage positions that is necessary to enable participants to comply with the Exchange's rules regarding position limits.

Core Principle 5 – Position Limitations or Accountability: Consistent with the Exchange's Rules, the amendments to Rule 6.5.7 provide instructions to participants for identifying spread and arbitrage positions to be excluded from position limits by providing specific qualifying information to the Exchange, which thereby further reduces the potential threat of market manipulation or congestion.

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

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 6.5.7