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November 8, 2016

VIA PORTAL

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

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

Dear Mr. Kirkpatrick:

Nodal Exchange, LLC (“Nodal Exchange” or “Exchange”) is notifying the Commodity Futures Trading Commission (“CFTC” or “Commission”) that it is self-certifying amendments to the Nodal Exchange Rulebook (“Rules”) pursuant to Commission Regulation 40.6(a). The Exchange is amending Rule 6.1.2 *Fraud*, Rule 6.2.3 *Price Manipulation, Fictitious, Non-Competitive or Artificial Transactions* and Rule 6.2.7 *Disruptive Practices*, which are attached hereto and indicate the specific text in red that is being amended. The Exchange intends to implement the amended Rules in 10 business days on November 23, 2016.

The Rules are being revised to be consistent with the CFTC Regulations. CFTC Regulation 180.1 *Prohibition on the employment, or attempted employment, or manipulative and deceptive devices*, makes it unlawful to use or *attempt to use* devices to manipulate or defraud. Accordingly, Rule 6.1.2 *Fraud* and Rule 6.2.3 *Price Manipulation, Fictitious, Non-Competitive or Artificial Transactions*, which are sections of the Exchange’s Participant Code of Conduct of Section VI of the Rules, are being amended to include the *attempt* to defraud or manipulate. Consistent with objective of Core Principle 12 *Protection of Markets and Market Participants*, Rule 6.2.7 is being amended to prohibit all disruptive practices and not only such practices that involve trading.

Exchange management has assessed the amendments to the Rules, 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 the amendments may affect the following Core Principles as follows:

Core Principle 2 - Compliance with the Rules: The amendments to the Rules provide clarity and consistency with the CFTC Regulations for compliance with the Rules. The

amendments encourage ethical conduct and protect Participants from abusive, disruptive, fraudulent or noncompetitive conduct or trade practices.

Add Core Principle 7 – Availability of General Information: The amendments to the Rules provide clarity to Exchange Participants regarding the Participant Code of Conduct. The amended Rules are available to market authorities, Participants and the public on the Exchange website.

Core Principle 12 – Protection of Markets and Market Participants: The amendments to the Rules are consistent with the CFTC Regulations to protect the market and market participants from abusive practices. The amendments to the Rules promote fair and equitable trading on Nodal Exchange.

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

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 703-962-9853 or Markotic@nodalexchange.com.

Sincerely,

/s/ Max Markotic

Compliance Manager

Attachment:

Redline of Nodal Exchange Rule 6.1.2

Redline of Nodal Exchange Rule 6.2.3

Redline of Nodal Exchange Rule 6.2.7