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June 17, 2010

G.F.T.O.
OFFICE OF THE SECRETARIAT
2010 JUN 22 PM 4 20

Via E-Mail: submissions@cftc.gov

Mr. David Stawick
Secretary of the Commission
Office of the Secretariat
Commodity Futures Trading Commission
3 Lafayette Centre
1155 21st Street, N.W.
Washington D.C. 20581

RE: Rule Certification: Nadex's Amendment to the strike widths for the US Tech 100 Variable Payout Contracts – Submission pursuant to Commission Regulation 40.6(a)

Dear Mr. Stawick:

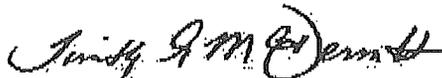
Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended ("Act"), and section 40.6(a) of the regulations promulgated by the Commodity Futures Trading Commission (the "Commission") under the Act (the "Regulations"), North American Derivatives Exchange, Inc. ("Nadex") hereby submits to the Commission its intent to correct an error in the strike widths for the US Tech 100 Variable Payout Contracts, set forth in Rule 12.87, which had previously been amended on March 17, 2010. In Exhibit B, Nadex has outlined the amendments to Nadex Rule 12.87. Nadex intends to implement these rule amendments effective for the start of business on trading day Monday, June 21, 2010.

No substantive opposing views were expressed to Nadex with respect to these amendments.

Nadex hereby certifies that the revisions contained herein comply with the Act and the Commission Regulations adopted thereunder.

Should you have any questions regarding the above, please do not hesitate to contact me by telephone at (312) 884-0171 or by email at tim.mcdermott@nadex.com.

Sincerely,



Timothy G. McDermott
General Counsel and Chief Regulatory Officer

CC: DMOSubmission@cftc.gov
Jon Hultquist – CFTC (Acting Branch Chief, DMO, Chicago)
Tom Leahy – CFTC
Riva Adriance – CFTC
Nancy Markowitz – CFTC

Yossi Beinart - Nadex

EXHIBIT A

12.87	US Tech 100 Variable Payout Contracts	4:15 PM ET	Amend strike widths on narrow variable payout contracts.	06/21/2010

EXHIBIT B

Amendments to Rules 12.87

(The following new Rule additions are underlined and deletions are stricken out)

RULE 1.1 – RULE 12.86 [Unchanged]

RULE 12.87 US TECH100 VARIABLE PAYOUT CONTRACTS

(a) - (e) [Unchanged]

(f) PAYOUT CRITERION – The Payout Criterion for each Contract will be set by Nadex at the time the Variable Payout Contracts are initially issued. For the US Tech 100 Variable Payout Contract, the Payout Criteria for the Contracts will be set as follows:

(i) DAILY VARIABLE US TECH 100 CONTRACTS, 4:15 PM ET CLOSE SPREAD - At the commencement of trading in a Daily Spread US Tech 100 Variable Payout Contract, Nadex shall list one (1) Variable Payout Contract, referred to as a 'Spread', which conforms to the Payout Criteria listed below:

(1) DAILY VARIABLE PAYOUT CONTRACT 'SPREAD'

(aa) CAP – The Cap shall be $X + 100$.

(bb) FLOOR – The Floor shall be $X - 100$.

(cc) DOLLAR MULTIPLIER – The Dollar Multiplier shall be 1.

(2) In each case, "X" equals the last NQFC price, as reported by the Source Agency, rounded to the nearest 50.

(ii) DAILY VARIABLE US TECH 100 CONTRACTS, 4:15 PM ET CLOSE NARROW SPREAD – At the commencement of trading in a Daily Narrow Spread US Tech 100 Variable Payout Contract, Nadex shall list a set of three (3) Variable Payout Contracts with overlapping ranges referred to as 'Narrow Spreads', which conform to the Payout Criteria listed below:

(1) DAILY VARIABLE PAYOUT CONTRACT 'NARROW SPREAD'

(aa) CONTRACT 1: The Cap shall be X; The Floor shall be $X - \underline{200100}$.

(bb) CONTRACT 2; The Cap shall be $X + \underline{10050}$; The Floor shall be $X - \underline{10050}$.

(cc) CONTRACT 3; The CAP shall be $X + \underline{200100}$; The Floor shall be X.

(dd) DOLLAR MULTIPLIER – The Dollar Multiplier shall be 1.

(2) In each case, "X" equals the last NQFC price, as reported by the Source Agency rounded to the nearest 50.

(i) Nadex may list additional Variable Payout Contracts with different ranges of Payout Criteria on a discretionary basis in accordance with the CEA and Commission Regulations.

(g) - (o) [Unchanged]

RULE 12.88 – RULE 12.95 [Unchanged]

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