

QCEX  
10055 Yamato Road, Suite 111  
Delray Beach, FL 33498

Via E-mail

June 16, 2022

Mr. Christopher J. Kirkpatrick, Esq.  
Secretary  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, D.C. 20581

Re: Application for Designation as a Contract Market by QCX LLC

Dear Mr. Kirkpatrick:

On behalf of QCX LLC (the “Exchange”), enclosed please find an application for the Exchange to be designated as a contract market pursuant to Section 5 of the Commodity Exchange Act, as amended (the “CEA”) and Part 38 of the regulations promulgated by the Commodity Futures Trading Commission (the “Commission”). In addition to this transmission letter and the petition for confidential treatment discussed further below, the application includes the following items (collectively with the letter and petition, the “Submission”):

1. Form DCM Cover Sheet;
2. Exhibit A (ownership information);
3. Exhibit B (officer and director information);
4. Exhibit C (governance fitness standards);
5. Exhibit D (organizational structure);
6. Exhibit E (personnel qualifications);
7. Exhibit F (staffing requirements);
8. Exhibit G (organizational documents);
9. Exhibit H (legal proceedings);
10. Exhibit I (financial information);
11. Exhibit J (affiliates’ financials);
12. Exhibit K (dues and fees);
13. Exhibit L (core principles compliance);
14. Exhibit M (the rulebook);

15. Exhibit N (executed and executable agreements);
16. Exhibit O (compliance manual);
17. Exhibit P (disciplinary procedures);
18. Exhibit Q (matching algorithm and examples);
19. Exhibit R (rules prohibiting trade practice violations);
20. Exhibit S (maintenance of trading data);
21. Exhibit T (clearing arrangements);
22. Exhibit U (information subject to confidentiality request);
23. Exhibit V (technology questionnaire);

The Exchange is submitting simultaneously a petition for confidential treatment of the Submission (except for this transmission letter, the petition for confidential treatment, the Form DCM cover sheet, Exhibit G and Exhibit M thereof) pursuant to Section 8(a) of the CEA and 145.9(d) of the Commission's regulations, a copy of which is enclosed with this letter. Pursuant to Section 8(a) of the CEA and 145.9(d) of the Commission's regulations, the Exchange requests confidential treatment of this Submission as well as all other enclosures, files, data and material submitted herewith on the grounds that disclosure of the Submission would reveal trade secrets or confidential commercial information of the Exchange. In addition to violating the Exchange's proprietary rights, the disclosure of the Submission would grant competitors an unfair advantage or compromise the competitive advantages possessed by the Exchange.

Please contact me or David J. Gilberg using the information below if you have any questions regarding this Submission.

Matt Childers  
QCX LLC  
10055 Yamato Road, Suite 111  
Delray Beach, FL 33498  
Phone: 517-775-9538  
Email: [matt.childers@qcex.com](mailto:matt.childers@qcex.com)

David J. Gilberg  
Sullivan & Cromwell LLP  
125 Broad Street  
New York, NY 10004  
Phone: (212) 558-4680  
Email: [gilbergd@sullcrom.com](mailto:gilbergd@sullcrom.com)

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Childers", written in a cursive style.

Matt Childers  
Chief Compliance Officer  
QCX LLC

(Enclosures)

cc: Nancy Markowitz  
(Commodity Futures Trading Commission)

Aleko Stamoulis  
(Commodity Futures Trading Commission)

Justin D. Hertzberg  
(QCX LLC)

David J. Gilberg  
Elianne Neuman Schiff  
(Sullivan & Cromwell LLP)