

March 21, 2022

## **VIA COMMISSION PORTAL**

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

Re: <u>Commission Regulation 40.6(a) – Rule Certification</u> LedgerX LLC Submission No. 22-03

Dear Mr. Kirkpatrick:

LedgerX LLC d/b/a FTX US Derivatives ("Company") hereby notifies the Commodity Futures Trading Commission (the "Commission"), pursuant to Section 5c(c) of the Commodity Exchange Act (the "CEA") and Commission Regulation 40.6(a), that it is certifying the attached update to its that it is certifying the attached amendments to its Business Continuity and Disaster Recovery Plan. The attached amendments will become effective on April 4, 2022.

The following is a concise explanation and analysis of the changes and amendments, and their compliance with applicable provisions of the CEA, including the Core Principles and the Commission's Regulations, Company has made to its Business Continuity and Disaster Recovery plan.

In this update, Company has updated Section 4.1 of its Business Continuity and Disaster Recovery Plan to reflect its new structure for cloud computing provider backups. These revisions are all consistent with **SEF Core Principle 14**, **DCM Core Principle 20**, and **DCO Core Principle I**, as well as CFTC Regulations 37.1401, 38.1051, and 39.18 requiring Company to establish and maintain emergency procedures and a plan for disaster recovery. *See* CEA §§ 5h(f)(14), 5(d)(20), and 5b(c)(2)(I); *see also* 17 C.F.R. §§ 37.1401,38.1051, and 39.18.

The changes and amendments to the Business Continuity and Disaster Recovery Plan, are reflected in a redlined copy designated as <a href="Exhibit A">Exhibit A</a>. The final version of the revised Business Continuity and Disaster Recovery Plan is attached at <a href="Exhibit B">Exhibit B</a>.

The Company certifies that the changes and amendments comply with the CEA and Commission Regulations thereunder. The Company additionally certifies that it has concurrently posted a copy of this submission letter and the attachments hereto on the Company website at <a href="https://derivs.ftx.us">https://derivs.ftx.us</a>. The Company is not aware of any or substantive opposing views to the changes and amendments.



Brian-A. Mulhirin

General Counsel, FTX US Derivatives

Please contact the undersigned at gc@ledgerx.com if you have any questions or you would otherwise like to discuss this further.

Sincerely,

Brian G. Mulherin

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