

April 8, 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. 22-04

Dear Mr. Kirkpatrick:

LedgerX LLC (d/b/a FTX US Derivatives) (the "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 amendments to its Rulebook. The attached amendments will become effective on April 22, 2022.

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, are as follows.

LedgerX has updated its Rulebook to remove nine (9) previously self-certified product rules in Section 12 of the Rulebook that do not have any current open interest (Rules 12.1 through 12.5, Rules 12.9 through 12.11, and Rule 12.16) and renumber the remaining products accordingly. All these changes are consistent with **DCM Core Principle 2** in that they establish the terms and conditions under which contracts are to be traded. They are also consistent with **DCO Core Principle C** in that they limit the eligibility of specified products for clearing based on trading volume. The changes to Rules 12.1, 12.2, 12.3, 12.4, and 12.5 are also consistent with **SEF Core Principle 2** in that they establish the terms and conditions under which contracts are to be traded.

The changes and amendments to the Rulebook are reflected in a redlined copy designated as **Appendix A**. The final version of the revised Rulebook is attached at **Appendix B**.

The Company certifies that the above 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 https://derivs.ftx.us. 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 <u>brian@ftx.us</u> if you have any questions or you would otherwise like to discuss this further.

Sincerely,

Brian G. Mulherin