



Via Portal Submission

July 8, 2016
MGEX Submission No. 16-15

Mr. Christopher J. Kirkpatrick
Secretary of the Commission
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street NW
Washington, DC 20581

RE: Rule Certification Submission Pursuant to CFTC Regulation 40.6(a); Update to MGEX Rules

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c) of the Commodity Exchange Act (“CEAct”) and Commodity Futures Trading Commission (“CFTC”) Regulation 40.6(a), the Minneapolis Grain Exchange, Inc. (“MGEX”) hereby certifies that MGEX Rule 410.00., as set forth in the attached Exhibit A, complies with the CEAct and the CFTC Regulations promulgated thereunder (collectively the “Proposed Amendment”). MGEX further certifies that the submission and pending changes to the MGEX Bylaws and Rules have been posted on the MGEX website at the following link: <http://www.mgex.com/regulation.html>.

I. AMENDMENTS TO MGEX RULES

MGEX continually evaluates its Rules to ensure compliance with CFTC regulations as well as general principles of law. MGEX has had a dispute resolution mechanism as part of its rulebook. MGEX recently amended these dispute resolution rules as a part of this continual evaluation in submission 16-13. The Proposed Amendment further clarifies the parties involved in dispute resolution and the mechanics of the arbitration panel.

II. COMPLIANCE WITH CORE PRINCIPLES

MGEX has reviewed the core principles for designated contract markets (“DCM Core Principles”) and identified that the Proposed Amendments may impact the following DCM Core Principles:

- *DCM Core Principle 2, Compliance with Rules:* The Proposed Amendments clarifies the dispute resolution mechanism offered by the MGEX Rules to better facilitate members or customers bringing claims for resolution by MGEX.
- *DCM Core Principle 14, Dispute Resolution:* The Proposed Amendments provide a mechanism whereby members or customers can seek enforcement of MGEX Rules. The

Proposed Amendments facilitate an alternative dispute resolution forum for both customers and members.

The concepts and plan to update the dispute resolution arbitration Rules were brought before the MGEX Board of Directors and no substantive opposing views were expressed by the Board of Directors, nor is MGEX aware of any substantive opposing views with respect to this filing.

These amendments are intended to become effective ten (10) business days from the date of this submission. If there are any questions regarding this submission, please contact me at (612) 321-7188. Thank you for your attention to this matter.

Best regards,

A handwritten signature in blue ink that reads "Emily Spott". The signature is written in a cursive style with a large initial "E" and a small "Spott" at the end.

Emily M Spott
Associate Corporate Counsel

Exhibit A

410.00. BOARD OF ARBITRATION.

Following the filing of a Complaint or Petition with the Secretary, the Secretary will constitute the Board of Arbitration by selecting three (3) persons from the Arbitration Pool, who will hear and decide the dispute between the parties (each known as an “Arbitrator”). The Board of Arbitration has all the powers and duties set forth in these Rules. Once appointed, each Arbitrator must submit an Impartiality Form (see **Form 4-01.00.**) to the Exchange. Each Arbitrator must be available for the Board of Arbitration to hear or decide any dispute.

In any dispute brought by a Customer or Member against a Member or Clearing Member, upon receipt of a Complaint, the Exchange will inform the Claimant in writing:

Of the nature and amount of any other fees or costs that may be assessed against the party if a dispute is submitted for arbitration pursuant to this Chapter. ~~The Claimant will bear no additional costs for choosing a mixed panel, unless the Arbitrators in a particular proceeding determine that the Claimant has acted in bad faith in initiating or conducting that proceeding.~~