August 6, 2015

**BY ELECTRONIC PORTAL**

Mr. Chris Kirkpatrick

Secretary

Commodity Futures Trading Commission

Three Lafayette Centre

1155 21st Street, N.W.

Washington, D.C. 20581

**Re: Regulation 40.6(a) Certification –**

**GFI Swaps Exchange LLC Submission # 15-0004**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c) of the Commodity Exchange Act (the “**Act**”) and Section 40.6(a) of the regulations of the Commodity Futures Trading Commission (the “**Commission**”), GFI Swaps Exchange LLC (“**GFI**” or the “**SEF**”) hereby submits the attached Notice 15-1 (the “Notice”) which contains clarifying amendments to GFI Rule 601 regarding the block trade treatment of package transactions. The Notice is being filed and distributed pursuant to a request from the staff of the Division of Market Oversight (the “Staff”) to make such conforming changes to effectuate the terms of a previously issued Staff no-action letter. Capitalized terms that are used herein without definition have the meaning ascribed to those terms in the Rules of the SEF.

\* \* \*

All information contained in the Notice is consistent with Core Principles and Staff no-action relief. As such, GFI hereby certifies that: (i) the Notice complies with the Act and the Commission’s Regulations thereunder; and (ii) a notice and copy of this submission is being concurrently posted on the SEF’s web site at <http://www.gfigroup.com/markets/swaps-exchange/rules-notices.aspx>. There were no substantive opposing views.

Please contact the undersigned at (212) 968-2982 or [daniel.glatter@gfigroup.com](mailto:daniel.glatter@gfigroup.com) if you have any questions or you would otherwise like to discuss this further.

Sincerely,

/s/ Daniel E. Glatter

General Counsel

cc: Marilee Dahlman

Attachments