



1921 Gallows Road, 3rd Floor
Tysons Corner, VA 22182
Phone (703) 962 9800
Fax (703) 962 9850
www.nodalexchange.com

November 12, 2015

VIA CFTC PORTAL

Commodity Futures Trading Commission
Attention: Chris Kirkpatrick, Secretary
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Re: CFTC Regulation 40.6(a) Certification: Amendments to Nodal Clear Rules 3.35(g), 3.37.5, 3.37.7, and 3.38.4

Dear Mr. Kirkpatrick:

Pursuant to Commodity Futures Trading Commission ("Commission" or "CFTC") Regulation 40.6(a), Nodal Clear, LLC ("Nodal Clear") hereby notifies the Commission that it is self-certifying amendments to Nodal Clear Rules 3.35(g), 3.37.5, 3.37.7, and 3.38.4. These amendments shall be effective on Monday, November 30, 2015.

Current Nodal Clear Rules 3.35(g) and 3.37.5 describe the post withdrawal date monetary default liability of a clearing member that has terminated its membership. Current Nodal Clear Rule 3.35(g) provides that the withdrawing clearing member is subject to assessments for monetary defaults occurring after the withdrawal date. Conversely, current Nodal Clear Rule 3.37.5 provides that the withdrawing clearing member is not subject to assessments for monetary defaults occurring after the withdrawal date. Such conflict is reconciled by revised Nodal Clear Rules 3.35(g) and 3.37.5 which provide that the withdrawing clearing member is subject to assessments for monetary defaults occurring after the withdrawal date to the extent the person that has withdrawn as a clearing member still maintains a guaranty fund deposit.

The amendment to Nodal Clear Rule 3.37.7 is necessary to conform the maximum amount Nodal Clear can assess clearing members in the event of an emergency with

the maximum amount Nodal Clear can assess clearing members in the event of multiple monetary defaults as provided in Nodal Clear Rule 3.35(e).

The amendment to Nodal Clear Rule 3.38.4 is necessary in order to correct a non-substantive error where the term "Nodal Clear" was mistakenly used instead of the defined term "Clearing House".

Nodal Clear management has assessed the amendments to Nodal Clear Rules 3.35(g), 3.37.5, 3.37.7, and 3.38.4, and their compliance with applicable provisions of the Commodity Exchange Act ("CEA"), including the Commission's Regulations and the Core Principles. Nodal Clear has identified that amended Nodal Clear Rules 3.35(g), 3.37.5, 3.37.7, and 3.38.4 may affect the following Core Principles as follows:

Core Principle G - Default Rules and Procedures: Consistent with Core Principle G, the amendments to Nodal Clear Rules 3.35(g) and 3.37.5 provide for the efficient, fair and safe management of events during which clearing members become insolvent.

Core Principle L - Public Information: As required by this Core Principle, Nodal Clear is publicly posting this self-certification letter on its website to ensure that market participants receive advance notice of the updated Nodal Clear Rules. On the effective date of the amendments, the updated Nodal Clear Rules will be posted on the Nodal Clear website.

Pursuant to Section 5c(c)(1) of the CEA and the Commission's Regulation 40.6(a), Nodal Clear certifies that the amendments to Nodal Clear Rules 3.35(g), 3.37.5, 3.37.7, and 3.38.4 comply with the CEA and the Commission's Regulations thereunder. Nodal Clear is not aware of any opposing views expressed regarding these amendments. Nodal Clear certifies that this submission has been concurrently posted on the Nodal Clear website at www.nodalclear.com.

If you have any questions or need additional information regarding this submission, please contact me at 703-962-9864 or alvarez@nodalexchange.com.

Sincerely,



Cody Alvarez
Chief Compliance Officer

Attachments:

Redline of Nodal Clear Rules 3.35(g), 3.37.5, 3.37.7, and 3.38.4