

March 15, 2024

VIA COMMISSION PORTAL

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

**Re: Commission Regulation 40.6(a) – Rule Certification
LedgerX LLC Submission No. 24-04**

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 the Company’s Swap Execution Facility (“**SEF**”) Rulebook. The attached amendments will become effective within 10 business days hereof. The current estimated effective date is **March 29, 2024**.

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.

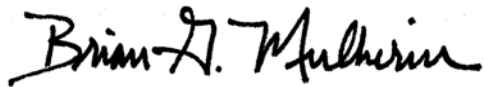
Subparagraphs G and H to Rule 12.7 have been revised to clarify that the Company shall post the list of Company Contracts available to be traded on its website, and the strike prices and intervals only pertain to contracts that are listed. Similarly, Rule 12.8 has been revised to clarify that the listing cycle for that contract shall be posted on the Company website. In all other respects, the material terms of those contracts are unchanged. These revisions are consistent with SEF Core Principle 4 and CFTC Regulation 37.400 in that they establish the procedures, terms and conditions for market participants to access and execute trades on the SEF.

The changes and amendments to the SEF Rulebook are reflected in a redlined copy designated as **Appendix A**. The final version of the revised SEF 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://ledgerx.com/reg-notices>. The Company is not aware of any or substantive opposing views to the changes and amendments.

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
General Counsel, LedgerX LLC