coinbase DERIVATIVES

September 17, 2026

VIA CFTC Electronic Portal

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

Re: CFTC Regulation 40.6(a) Certification: Modifications to Rule 305 (Fees)
Coinbase Derivatives Submission #2026-59

Dear Mr. Kirkpatrick:

Pursuant to Commodity Futures Trading Commission ("CFTC" or "Commission") Regulation 40.6(a), Coinbase Derivatives, LLC (the "Exchange") hereby submits for self-certification modifications to Rule 305(d) to allow privileges of membership to its eligible members for purposes of fees. The modifications will become effective on October 1, 2026.

The modifications to Rule 305(d) are set forth in Appendix A, attached hereto.

Compliance with Core Principles

The Exchange has reviewed the designated contract market ("DCM") core principles ("Core Principles") set forth in the Commodity Exchange Act and the CFTC rules thereunder and has identified that the following Core Principles that may be directly implicated by the modification:

Core Principle 7 - Availability of General Information

The Exchange will publish this submission 2026-59 and the modified rules on its website to ensure all participants have been advised of this modification regarding fees.

Core Principle 21 - Financial Resources

The modification will not impact the Exchange's ability to discharge its financial, operational, or managerial responsibilities as a DCM.

Certification

The Exchange is not aware of any substantive opposing views to the modification. The Exchange certifies that the modification complies with the Commodity Exchange Act and the rules and regulations promulgated thereunder.

The Exchange certifies that this submission has been concurrently posted on the Exchange's website at: https://www.coinbase.com/derivatives.

If you have any questions or require any further information, please contact me at jane.downey@coinbase.com.

Sincerely,

/s/ Jane Downey
Chief Regulatory Officer

Attachment: Appendix A

Appendix A

(~~deletions~~ stricken-through; additions underlined)

RULE 305. Dues, Assessments and Fees

(a) The Exchange shall have the authority to set the amounts and times of payment for any dues, assessments, transaction fees, or other charges (“Fees”) to be paid by Participants.

(b) Each Participant agrees to pay such Fees when they are due. The Exchange will notify Participants of changes in the Fees by notice and/or posting the changes on its website.

(c) If a Participant fails to pay when due any such Fees levied on such Participant, and such payment obligation remains unsatisfied for thirty (30) days after its due date, the Exchange may suspend, revoke, limit, condition, restrict or qualify the Participant’s Trading Privileges and/or ability to otherwise access the Exchange Trading System as it deems necessary or appropriate.

(d) Pursuant to NFA rules, eligible Participants ~~(those meeting the definition of a Market Maker or Professional Trader on the Exchange)~~ will receive Privileges of Membership for purposes of NFA Bylaw 1301. The Exchange does not assess NFA fees.