



August 2, 2017

**Via CFTC Portal**

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

**RE: trueEX LLC Amendment of Product Terms and Conditions (trueEX LLC submission #2017-06S)**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (the “Act”), and Commission Regulation 40.6(a), trueEX LLC (“trueEX” or the “Exchange”) hereby submits to the U.S. Commodity Futures Trading Commission (the “Commission”) certain amendments to terms and conditions of fixed vs. floating interest rate swaps offered for trading on trueEX.

**Summary of Amendments**

<b>trueEX Rule</b>	<b>Nature of Amendment</b>
<b>Schedule 1001</b> – changing the maximum tenor for the following currencies: <ul style="list-style-type: none"><li>• LCH DKK from 10 years to 31 years</li><li>• LCH NOK from 10 years to 15.5 years</li><li>• LCH PLN from 10 years to 15.5 years</li></ul>	CFTC Regulation 40.6(a)
<b>Schedule 1001 (a)</b> – changing maximum tenor for the following currencies: <ul style="list-style-type: none"><li>• CME NOK and LCH NOK from 10 Years to 15 years.</li></ul>	CFTC Regulation 40.6(a)

Exhibit 1 contains redlined amendments to trueEX’s PTC Product Schedule (Schedule 1001; columns J and R) and trueEX’s CLOB/RFQ Schedule (Schedule



1001A; columns I and Q), which have been updated to reflect the new maximum tenor for each currency.

trueEX certifies that these amendments complies with the Act and the Commission's regulations thereunder. trueEX's analysis of the operation, purpose and effect of the proposed rule change and its compliance with the Act, core principles and Commission's regulations thereunder is included in the chart above. There were no substantive opposing views expressed by the trueEX governing board or market participants to the rule amendments.

trueEX certifies that this certification has been concurrently posted on the Exchange's Web Site at <http://www.trueex.com/rules-and-notice>. These amendments will be effective on August 16, 2017.

If you have questions regarding this notice, please contact me at (312) 320-8934 or by email at [fran@trueex.com](mailto:fran@trueex.com).

Sincerely,

A handwritten signature in black ink that reads "Fran Kenck". The signature is written in a cursive, flowing style.

Fran Kenck  
Chief Compliance Officer

**Schedule 1001**  
**IRS Fixed for Floating Swaps eligible for Portfolio Terminations and**  
**Compactions ("PTC") on The SEF Trading System.**

**Holiday Business Day Convention**

**CME**

Currency	Float Rate Index	Product Type	Start Date (Spot Starting)	Fixing Date Offset	Roll Types	Holiday Business Centers - Float Fixing Dates	Holiday Business Centers - Effective and Payment Dates	Holiday Business Centers - Expiration Date	Max Tenor (yrs)	Valid Fixed Payment Frequencies	Valid Float Designated Maturities	Valid Float Payment Frequencies	Valid Float Reset Frequencies
DKK	DKK-CIBOR-DKNA13, DKK-CIBOR2-DKNA13	IRS	2	0 (-2 for CIBOR2)	Standard, IMM, EOM, None	DKCO	DKCO	n/a	30	1M, 3M, 6M, 12M	6M	6M, 12M	6M

			LCH										
Valid Stub Index Frequencies	Float Leg Day Count	Fixed Leg Day Count	Max Tenor (yrs)	Valid Fixed Payment Frequencies	Valid Float Designated Maturities	Valid Float Payment Frequencies	Valid Float Reset Frequencies	Valid Stub Index Frequencies	Float Leg Day Count	Fixed Leg Day Count	Max Tenor (yrs)	Valid Fixed Payment Frequencies	Valid Float Designated Maturities
1W, 2W, 1M-12M	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA	30/360 ACT/360 ACT/365.FIXED ACT/ACT.ISDA 30E/360 30E/360.ISDA	<del>40</del> 31	1M, 3M, 6M, 12M, 1T	1M, 3M, 6M, 12M	1M, 3M, 6M, 12M, 1T	1M, 3M, 6M, 12M	1W, 1M, 2M, 3M, 4M, 5M, 6M, 9M, 12M	ACT/360	30/360 30E/360 ACT/360 ACT/365.Fixed ACT/365.ISDA ACT/ACT.ISMA ACT/ACT.ISDA 30E/360.ISDA ACT/ACT.ICMA	30	1M, 3M, 6M, 12M, 1T	1M, 3M, 6M, 12M

UNCLEARED

Valid Float Payment Frequencies	Valid Float Reset Frequencies	Valid Stub Index Frequencies	Float Leg Day Count	Fixed Leg Day Count
1M, 3M, 6M, 12M, 1T	1M, 3M, 6M, 12M, 1T	1W, 1M, 2M, 3M, 4M, 5M, 6M, 9M, 12M	30/360 30E/360 30E/360.ISDA ACT/360 ACT/365.Fixed ACT/ACT.ISDA ACT/ACT.ICMA	30/360 30E/360 30E/360.ISDA ACT/360 ACT/365.Fixed ACT/ACT.ISDA ACT/ACT.ICMA

Schedule 1001(a) Fixed/Floating Interest Rate Swaps (Core RFQ)						Holiday Business Day Convention		CME					
Currency	Float Rate Index	Product Type	Spot Starting	Fixing Date Offset	Roll Types	Holiday Business Centers - Float Fixing Dates	Holiday Business Centers - Effective and Payment Dates	Max Tenor (yrs)	Valid Fixed Payment Frequencies	Valid Float Designated Maturities	Valid Float Payment Frequencies	Valid Float Reset Frequencies	Valid Stub Index Frequencies
NOK	NOK-NIBOR-OIBOR	IRS	2	-2	Standard	NOOS	NOOS	<del>40</del> 15	12M	6M	6M	6M	N/A

LCH

Float Leg Day Count	Fixed Leg Day Count	Max Tenor (yrs)	Valid Fixed Payment Frequencies	Valid Float Designated Maturities	Valid Float Payment Frequencies	Valid Float Reset Frequencies	Valid Stub Index Frequencies	Float Leg Day Count	Fixed Leg Day Count
ACT/360	30/360	<del>40</del> 15	12M	6M	6M	6M	N/A	ACT/360	30/360