



January 5, 2024

Submitted via CFTC Portal

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

Re: SpectrAxe LLC – Amendments to Rulebook (General Amendments, Rule 101, Rule 204, Rule 212, Rule 302, Rule 306, Rule 312, Rule 314, Rule 403, Rule 404.C, Rule 405, Rule 406, Rule 407, Rule 412, Rule 413, Rule 414, Rule 415, Rule 416, Rule 502, Rule 503, Rule 903, Rule 1102 and Rule 1104), Fee Schedule, and Discount Program

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”), SpectrAxe LLC (“SpectrAxe”) hereby submits (i) amendments to its Rulebook related to the above-captioned Rules (the “Amended Rules”), (ii) its Fee Schedule (the “Fee Schedule”), and (iii) its Price Maker Discount Program (the “Discount Program”). Attachment A, provided under separate cover, provides explanations of the amendments to the Rulebook and the amendments to the Rulebook in blackline and clean format, respectively. Attachment B, provided under separate cover, provides the Fee Schedule. Attachment C, provided under separate cover, provides the Discount Program. SpectrAxe is requesting confidential treatment of the Fee Schedule and the Discount Program, which are being simultaneously submitted to the Commission with this submission.

The amendments, Fee Schedule, and Market Maker Program will become effective on January 22, 2024, no fewer than ten business days from the date hereof.

In connection with this submission, SpectrAxe hereby notifies the Commission that:

1. SpectrAxe certifies that it has posted a notice of this pending certification with the Commission and a copy of this submission on SpectrAxe’s website, including redlines of the Amended Rules and clean format, which are attached hereto as Attachment A;
2. SpectrAxe certifies that the Amended Rules comply with the Act and the Commission’s regulations thereunder; and
3. No substantive opposing views with respect to the Amended Rules were expressed to SpectrAxe by its governing board or committee members, members of SpectrAxe or market participants.

* * *

Mr. Christopher J. Kirkpatrick
Commodity Futures Trading Commission
January 5, 2024

Should you have questions regarding this submission, please do not hesitate to contact Cheryl L. Isaac, K&L Gates, LLP at +1-202-778-9089 or Cheryl.Isaac@klgates.com, or the undersigned at +1-929-581-0340 or mlee@spectrax.com.

Very truly yours,

Michael Lee
Chief Compliance Officer
SpectrAxe

Attachment A

SpectrAxe Rulebook

Amendments Generally and to Rule 101, Rule 204, Rule 212, Rule 302, Rule 306, Rule 312, Rule 314, Rule 403, Rule 404.C, Rule 405, Rule 406, Rule 407, Rule 412, Rule 413, Rule 414, Rule 415, Rule 416, Rule 502, Rule 503, Rule 903, Rule 1102 and Rule 1104

(explanation of changes)
(blackline format)
(clean format)
(provided under a separate cover)

Attachment B

SpectrAxe Fee Schedule

(clean format)
(provided under a separate cover)

(CONFIDENTIAL TREATMENT REQUESTED)

Attachment C

SpectrAxe Price Maker Discount Program

(clean format)
(provided under a separate cover)

(CONFIDENTIAL TREATMENT REQUESTED)