

Please find attached:

- An undertaking by the Chairman of the Executive Board (or functional equivalent[s]) of the NCC to notify Commission staff promptly if any of the representations made in connection with this supplement cease to be true or correct, or become incomplete or misleading.

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

Dear Mr. Kirkpatrick,

We hereby confirm that, at the moment of the Supplement S-1 to FBOT Application filing, all data contained in the documents and applications is complete and true. We undertake to notify CFTC staff promptly if any of the representations made in connection with or related to the FBOT application for registration cease to be true or correct, or become incomplete or misleading.

Best regards,

A handwritten signature in blue ink, appearing to read 'A. Khavin', with a stylized flourish at the end.

Alexey Khavin, Chairman of the Executive Board