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October 11, 2012

Via E-Mail

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

Division of Market Oversight Att'n: Nancy Markowitz Commodity Futures Trading Commission Three Lafayette Centre 1155 21st Street, N.W. Washington, D.C. 20581

Re: Application for Designation as a Contract Market by Nodal Exchange, LLC

Ladies and Gentlemen:

On behalf of Nodal Exchange, LLC ("Nodal"), enclosed please find an application for Nodal to be designated as a contract market. The application consists of this transmittal letter; three attached files, respectively designated as "Confidential Submission (Part 1)," "Confidential Submission (Part 2)" and "Non-Confidential Submission"; and a petition for confidential treatment that is being separately submitted by Nodal.

In a letter dated March 9, 2009, the Division of Market Oversight acknowledged the Commission's receipt of the notification provided by Nodal of Nodal's intent to operate an exempt commercial market ("ECM"). Nodal commenced trading as an ECM in April 2009 and has continued to operate in that capacity since that date. Nodal petitioned for ECM grandfather relief pursuant to Section 723(c)(2)(A) of the Dodd-Frank Act on September 2 and September 15, 2010. Through the enclosed application, and pursuant to Section 5(b) of the Commodity Exchange Act, Part 38 of the Commission's regulations thereunder and the Second Amendment to July 14, 2011 Order for Swap Regulation (77 Fed. Reg. 41260 (July, 13, 2012)), Nodal is now applying for designation as a contract market.

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LONDON AFFILIATE: KATTEN MUCHIN ROSENMAN UK LLP

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Questions regarding this application should be directed to the attention of Paul Cusenza or the undersigned at the addresses and telephone numbers below:

Paul Cusenza Chairman of the Board and Chief Executive Officer Nodal Exchange, LLC 8065 Leesburg Pike 3rd Floor Vienna, VA 22182-2733 (703) 962-9812 <u>cusenza@nodalexchange.com</u>

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Very truly yours, Kenneth M. Rosenzweig

Encl.

Paul Cusenza Nodal Exchange, LLC