



**NYSE Liffe**  
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**By Electronic Mail**

April 6, 2009

Mr. David A. Stawick  
Secretary  
Commodity Futures Trading Commission  
1155 21<sup>st</sup> Street NW  
Washington DC 20581

**Re: 2009-110 NYSE Liffe, LLC – Guidance on Rule 419 – Reportable Positions and Large Trader Report Codes**

Dear Mr. Stawick:

I am the Chief Regulatory Officer of NYSE Liffe, LLC (“NYSE Liffe US” or the “Exchange”). Pursuant to U.S. Commodity Futures Trading Commission Rule 40.6, I enclose a Cover Sheet for NYSE Liffe, LLC Submission 2009-110 and NYSE Liffe US Notice 12/2009. Notice 12/2009 provides guidance on NYSE Liffe US Rule 419, by reminding Members of changes in commodity codes and Member Firm IDs flowing from the change in Clearing Service Provider as of the March 30, 2009 Trading Session as discussed with Members at Member Meetings and Conference Calls prior to the clearing migration.

NYSE Liffe US hereby confirms that Notice 12/2009 complies with the Commodity Exchange Act and the Regulations thereunder.

If you have any questions, please call me at (212) 656-4568.

With best regards,

Karl D. Cooper

Enclosures



## NYSE LIFFE U.S. NOTICE No. 12/2009

ISSUE DATE: April 6, 2009  
EFFECTIVE DATE: April 6, 2009

### NYSE Liffe U.S. – Guidance on Rule 419 – Reportable Positions and Large Trader Report Codes

#### Summary

This Notice provides guidance on NYSE Liffe U.S. Rule 419 and Members' Large Trader Reports, reminding Members of changes in commodity code designations and member firm identification codes related to the migration of clearing services.

#### 1. Introduction

- 1.1 NYSE Liffe U.S. Rule 419 requires each Member that is required to file a report with the Commission pursuant to Commission Regulations Part 15, 17, 18 or 19 must simultaneously file a copy of the report with the Market Regulation Department. Notice 1/2008 set forth the reportable levels under Rule 419. As set forth in Notice 3/2008, the National Futures Association, as the Exchange's Compliance Service Provider, has been given the responsibility to receive these reports on behalf of the Exchange.
- 1.2 As a result of the migration of clearing services to The Options Clearing Corporation (OCC), the commodity codes for the Exchange's Contracts have changed. In addition, a number of the Clearing Members' Firm identifications have changed, and some Members who were Clearing Members when the Exchange cleared at CME are now clearing through another Member who is a Clearing Member with OCC.

#### 2. New Commodity Codes and Firm IDs

- 2.1 As a result of the OCC clearing migration, Members filing Large Trader Reports must substitute in their reports for each of the following CME numeric commodity codes the alpha code set forth below:

Contract	CME Numeric Code	New Alpha Code
100 oz. Gold	38	ZG
5,000 oz. Silver	39	ZI
1,000 oz. Silver	61	YI
33.2 oz. Gold	63	YG

- 2.2 Members that are Clearing Members at OCC should use their OCC identification number to identify themselves as the submitter of the report. Members who are not Clearing Members at OCC should use their Exchange ID number to identify themselves as the submitter of the report. Please note that some non-clearing Members have submitted reports with their Clearing Member's ID but a blank for the reporting firm's ID. Members are asked to review

their Large Trader Reporting processes immediately for compliance with this guidance and correct any problems found without delay.

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For further information in relation to this Notice, Members should contact the following:

Market Regulation	1 212 656 4300	<a href="mailto:nyseliffe@nyx.com">nyseliffe@nyx.com</a>
New York Office	1 212 656 4300	<a href="mailto:nyseliffe@nyx.com">nyseliffe@nyx.com</a>