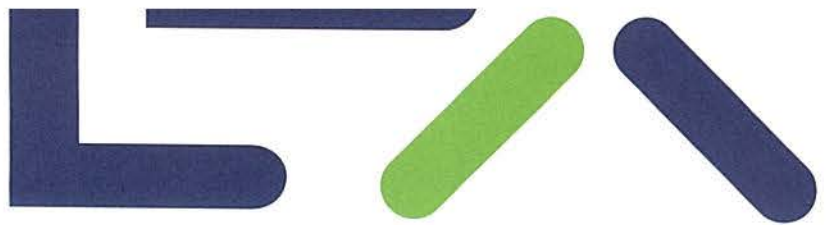


X-pand into the Future



November 20, 2013

Mr. Duane Andresen
Foreign Board of Trade Review Section
Division of Market Oversight
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Re: Eurex Deutschland Foreign Board of Trade Application – Updated Materials

Dear Mr. Andresen,

Pursuant to Section 4(b)(1) of the Commodity Exchange Act ("the Act"), 7 U.S.C. §6(b)(1), and Part 48 of the Commission's regulations, Eurex Deutschland ("Eurex") is submitting an update to the materials it previously submitted in furtherance of its Foreign Board of Trade ("FBoT") application. Eurex's Foreign Board of Trade ("FBoT") application has been submitted in order to extend existing no-action relief respecting the granting of direct access to its members located in the U.S. With respect to its August 2012 application, this letter along with exhibits, supplemental documents and other supporting information and representations are submitted to demonstrate Eurex's ability to comply with the requirements of the Act and applicable Commission regulations thereunder, including Regulation 48.7 and, in particular, the representations of the Chief Executive Officers of Eurex Deutschland and Eurex Clearing AG, respectively, contained in Exhibit A-9 of Form FBoT and Supplement S-1 Exhibit A-3(8) to inform the Commission if any of the representations made in connection with Eurex's original FBoT application "cease to be true or correct, or become incomplete or misleading."

Request for Confidential Treatment

Please be advised that Eurex respectfully requests confidential treatment of those portions of its application that are not required by Commission Regulation 40.8(a) to be made publicly available. Eurex is separately filing, in accordance with CFTC Regulation 145.9, a petition for confidential treatment of those portions of its FBoT application that are not required by Commission Regulation 40.8(a) to be made publicly available.

Listing of Updated Exhibits

As with its original August 2012 Form FBoT application, defined terms, used but not otherwise defined in the application and this update, shall have the same meaning attributed to them across all exhibits to the original Form FBoT application and this update, unless the context requires otherwise.



Eurex Deutschland Borsenplatz 4 60313 Frankfurt/Main Germany	Mailing Address : 60485 Frankfurt/Main Germany T : 312 544 1000 F : 312 544 1001	Vassilis Vergotis T 312 544 1477 F 312 544 614771 www.eurexchange.com	Management Board: Thomas Book, Michael Peters, Andreas Preuss, Peter Reitz, Jürg Spillmann ARBN: 101 013 361
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Below is a listing of the updated exhibits attached hereto to update Eurex Deutschland's foreign board of trade application:

Exhibit	Description of Updated Exhibit	Replacement or Supplement?
Exhibit A-1(1) Locations	Updated to include new office address for Eurex Zurich	Replacement
Exhibit A-1(3) Size of Eurex Deutschland	Volume and membership figures have been updated.	Replacement
Exhibit A-1(5) Corporate Structure	Changes in ownership structure	Replacement
Exhibit A-3(2) Clearing Agreements	New Clearing Agreements have been added to reflect additional segregation models.	Supplement
Exhibit A-4.--Terms and Conditions of contracts to be made available through direct access to Eurex derivatives products in the U.S.	This exhibit has been updated to reflect products currently available to Eurex members located in the U.S. as of the date of this letter. Several new products have been added and one product has been delisted since August 2012.	Replacement
Exhibit A-5.--National statutes, laws and regulations governing the activities of the FBoT and its respective participants.	This exhibit has been updated to include updated texts of existing statutes as well as the addition of several new statutes, including EMIR, MiFiD II and the German High Frequency Trading Law ("HFT Law").	Supplement
Exhibit A-6.--Current rules, regulations, guidelines and bylaws of the FBoT.	Attachments to this Exhibit have been updated to include the most current rules, regulations, guidelines and bylaws of Eurex Deutschland.	Replacement
Exhibit B.--Membership criteria	This exhibit has been updated to reflect changes in rules affecting membership criteria, including: 1) allowing traders to execute orders for multiple Eurex members; 2) allowing traders to enter orders from locations that are not the business premises of Eurex members; 3) Eurex's new outsourcing framework; and 4) rules and membership application processes implementing the new German HFT Law.	Replacement
Exhibit D.--Automated Trading System	With the implementation of a new trading architecture, virtually all sections of this exhibit have been modified to reflect the new trading platform architecture.	Replacement
Exhibit E-4 is a description of the terms and conditions of derivatives contracts being	Contract specifications have been updated where necessary. Additionally, delisted contracts have been removed and newly	Replacement

made available to trade in the U.S. by Eurex Deutschland.	certified derivatives contract specifications have been added.	
Exhibit F.—Regulatory Regime Governing the Foreign Board of Trade in its Home Country	This exhibit has been updated to include a discussion of changes to existing statutes as well as the addition of several new statutes, including EMIR, MiFiD II and the German High Frequency Trading Law (“HFT Law”).	Supplement
Exhibit G.—Rules of the Foreign Board of Trade and Enforcement Thereof	Current versions of Eurex Deutschland Exchange Rules, Clearing Conditions, Contract Specification Rules, Risk Committee Statutes, and Default Management Rules	Retention of explanation of Enforcement Program; Replacement of Rules, Clearing Conditions, etc.
Supplement S-1.—Eurex Deutschland Clearing Organization	Exhibits and Supporting documentation have been changed to reflect: 1) Changes to Governing Committee membership; 2) new clearing models adopted as a result of EMIR requirements; 3) changes to the laws of the home country of the clearing organization; and 4) establishment of a new clearing compliance function.	Replacements
Undertakings or representations by the CEOs of Eurex Deutschland and Eurex Clearing AG to notify the CFTC if any of the representations made in furtherance of the FBoT application cease to be true or correct, or become incomplete or misleading.	With the additional representations made in these updated materials and a change in the individual holding the title of CEO of Eurex Clearing AG, updated undertakings are also being submitted to the Commission.	Replacements

Please be advised that this Foreign Board of Trade application is intended to apply to Eurex Deutschland’s listed business, i.e., we are relying on our clearing organization, Eurex Clearing AG’s compliance with IOSCO standards rather than any status vis-à-vis DCO registration with the Commission to meet the standards for registration as a foreign board of trade and its associated clearing organization.

Accordingly, we would be extremely appreciative if you could provide us with an indication of when we can expect the Commission to consider this FBoT application for Eurex Deutschland.

If you have any questions respecting the submission of these FBoT registration application materials or with respect to the application generally, please contact Vassilis Vergotis, Executive Vice President at vassilis.vergotis@deutsche.borse.com or Ms. Mary Irwin, Legal Consultant, at mary.irwin.ext@deutsche.borse.com.

Yours faithfully,



Michael Peters
Member of the Management Board,
Eurex Deutschland



Thomas Book
Member of the Management Board,
Eurex Deutschland