

March 13, 2019

VIA ELECTRONIC PORTAL

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

Re: FTSEF LLC – Regulation 40.6 Rule Certification: Rulebook, Version 1.2

Dear Ladies and Gentlemen:

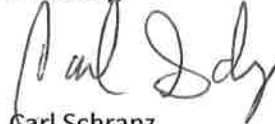
Pursuant to Section 5c(c) of the Commodity Exchange Act (the “Act”) and Section 40.6(a) of the regulations of the Commodity Futures Trading Commission (the “Commission”), FTSEF LLC hereby notifies the Commission that it has amended its Rulebook. The Rulebook has been amended to update certain No Action Letters on which it relies. The amended rulebook will become effective March 28, 2019.

I have provided an explanation of the changes in exhibit A. A clean copy of the amended rulebook and a copy of the amended Rulebook marked to show changes against the previous version is also submitted.

FTSEF hereby certifies that: (i) the amended Rulebook complies with the Act and the Commission’s regulations thereunder, and (ii) a notice and copy of this submission is being concurrently posted on FTSEF LLC’s website. Because the amendments to the Rulebook are non-substantive, the amended Rulebook is being made effective without request for comment, subject to the Commission’s review period of ten business days.

Please contact me with any questions regarding this matter.

Sincerely,



Carl Schranz

Chief Compliance Officer

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212-232-8347 (phone)

**Exhibit A**

<b>Rulebook Amendment</b>	<b>Explanation</b>	<b>Applicable Core Principal/Commission Regulation/SEF Policy</b>
Rule 404 (1)(iii)	Rulebook referenced NAL 16-25 which has expired. Updated to reflect NAL 17-17.	\$40.6
Rule 405(c)	Rulebook referenced NAL 15-68 which has expired. Updated to reflect NAL 17-54.	\$40.6
Rule 409 (e)	Rulebook references NAL 15-24 which has expired. Updated to reflect NAL 17-27.	\$40.6
Rule 602(a)	Rulebook references NAL 15-60 which has expired. Updated to reflect NAL 17-60.	\$40.6
Rule 409	Eliminated formatting error in sections (c) though (h)	