

September 19, 2017

**VIA COMMISSION PORTAL**

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

**Re: Commission Regulation 40.6(a) – Rule Certification  
LedgerX LLC Submission No. 17-02  
Confidential Treatment Requested by LedgerX LLC**

Dear Mr. Kirkpatrick:

LedgerX LLC (“LedgerX”) hereby notifies the Commodity Futures Trading Commission (the “Commission”), pursuant to Section 5c(c) of the Commodity Exchange Act (the “CEA”) and Commission Regulation 40.6(a), that it is certifying the attached amendments to the Operations Manual. The attached amendments will become effective on October 4, 2017.

A concise explanation and analysis of the amendments and their compliance with applicable provisions of the CEA, including the Core Principles, and the Commission’s Regulations, is attached hereto as Appendix A. A marked copy of the amendments is attached hereto as Appendix B. LedgerX is requesting confidential treatment for Appendix B. A request for confidential treatment and detailed written justification is being simultaneously submitted to the Commission.

LedgerX certifies that the amendments comply with the CEA and Commission Regulations thereunder. LedgerX additionally certifies that it has concurrently posted a copy of this submission letter and the attachments hereto on LedgerX’s website at <https://ledgerx.com/>. There were no substantive opposing views to the amendments.

\* \* \* \*

Please contact the undersigned at (917) 677-7598 or [ian@ledgerx.com](mailto:ian@ledgerx.com) if you have any questions or you would otherwise like to discuss this further.

Sincerely,

Ian J. Darrow  
General Counsel  
LedgerX LLC

Enclosure

**Appendix A**

<b>Rule/Section</b>	<b>Explanation</b>	<b>Core Principle or other CEA Provision, Commission Regulation and/or Commission Staff Letter</b>
§§ II.A, IV.B.2, IV.B.5	Clarify collateralization mechanics for LedgerX’s day-ahead swap product. All LedgerX products are fully collateralized.	Core Principle D Core Principle E
§ VII.B	Clarification of acceptable vehicles for Participant fund storage in accordance with applicable regulations.	Core Principle F 17 CFR. 39.15(c) 17 CFR. 39.15(e)
§ VIII.B	Additional constraint on individuals with access to bitcoin private key materials to enhance security.	Core Principle I
§ VIII.D.1	Adjustment to HSM signing quorum to [REDACTED] in connection with additional hiring and position changes to enhance operational reliability.	Core Principle D Core Principle E Core Principle I
§ XVI.B.3	Addition of CFTC notification requirement of security incidents that materially impair automated system operation, reliability, security, or capacity.	Core Principle I
§§ XVI.D.E – XVI.D.F	Clarification of procedures regarding penetration testing scope, change control and patch management, and logging.	Core Principle I Letter Agreement between LedgerX and the Division of Clearing and Risk
§ XVI.D.F.8	Imposition of internal notification requirements for certain material changes to LedgerX’s automated systems.	Core Principle I
Throughout	Conforming non-substantive changes to time and date formatting.	N/A

<b>Rule/Section</b>	<b>Explanation</b>	<b>Core Principle or other CEA Provision, Commission Regulation and/or Commission Staff Letter</b>
Throughout	Conforming non-substantive changes to ensure consistent uses of the terms “Participant” and “customer” (which were previously used interchangeably).	N/A

**Appendix B**

[SEE ATTACHED]