August 6, 2015

BY ELECTRONIC PORTAL

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

Re: Regulation 40.6(a) Certification –
GFI Swaps Exchange LLC Submission # 15-0004

Dear Mr. Kirkpatrick:

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”), GFI Swaps Exchange LLC (“GFI” or the “SEF”) hereby submits the attached Notice 15-1 (the “Notice”) which contains clarifying amendments to GFI Rule 601 regarding the block trade treatment of package transactions. The Notice is being filed and distributed pursuant to a request from the staff of the Division of Market Oversight (the “Staff”) to make such conforming changes to effectuate the terms of a previously issued Staff no-action letter. Capitalized terms that are used herein without definition have the meaning ascribed to those terms in the Rules of the SEF.

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All information contained in the Notice is consistent with Core Principles and Staff no-action relief. As such, GFI hereby certifies that: (i) the Notice complies with the Act and the Commission’s Regulations thereunder; and (ii) a notice and copy of this submission is being concurrently posted on the SEF’s web site at http://www.gfigroup.com/markets/swaps-exchange/rules-notices.aspx. There were no substantive opposing views.
Please contact the undersigned at (212) 968-2982 or daniel.glatter@gfigroup.com if you have any questions or you would otherwise like to discuss this further.

Sincerely,

/s/ Daniel E. Glatter
General Counsel

cc: Marilee Dahlman

Attachments