

October 26, 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. 17-08-A**

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 its Rules. The attached amendments will become effective on November 9, 2017.

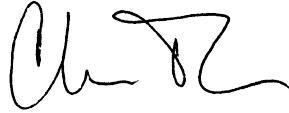
A concise explanation and analysis of the amendments and their compliance with applicable provisions of the CEA, including the Core Principles, and the Commission’s Regulations, is attached hereto as Appendix A. A marked copy of the amendments is attached hereto as Appendix B.

LedgerX 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 chuck@ledgerx.com if you have any questions or you would otherwise like to discuss this further.

Sincerely,

A handwritten signature in black ink, appearing to read 'CDT', with a stylized flourish at the end.

Charles D. Thompson
Chief Compliance Officer
LedgerX LLC

Enclosure

Appendix A

Rule/Section	Explanation	Core Principle or other CEA Provision, Commission Regulation and/or Commission Staff Letter
Rule 5.6	Extend the Trading Hours of the Exchange to 24 hours a day, seven days a week. The actual Trading Hours applicable to any given Exchange Contract will continue to be on a per-Exchange Contract basis. Overall, the Exchange expects that providing market participants access to Exchange Contracts on a 24/7 basis will improve the liquidity in such Exchange Contracts and foster open, transparent and competitive markets in those Exchange Contracts.	SEF Core Principle 2 SEF Core Principle 7 DCO Core Principle E
Throughout	Miscellaneous typographical and consistency corrections.	N/A

Core Principle Review

The Exchange has reviewed the swap execution facility core principles (“SEF Core Principles”) and the derivatives clearing organization core principles (“DCO Core Principles”) as set forth in the Commodity Exchange Act and identified that the proposed amendment to Rule 5.6 (the “Proposed Rule”) may have some bearing on the following principles. Capitalized terms used by not defined herein have the respective meanings given to them in the LedgerX LLC Rulebook.

SEF Core Principle 2 – Compliance with Rules. The Proposed Rule is consistent with the Exchange’s obligations to monitor and enforce compliance with the rules of the contract market, including the terms and conditions of any contracts to be traded and any limitations on access to the contract market. Specifically, this Proposed Rule harmonizes access to contract markets across participants regardless of their geographic location.

SEF Core Principle 7 – Availability of General Information. The Proposed Rule will be added to the Exchange’s publicly available rulebook and this submission 2017-8A will be posted to the Exchange’s public website concurrently with its submission to the Commission.

DCO Core Principle E – Settlement Procedures. The Proposed Rule is consistent with the Exchange’s obligations to identify and manage risks associated with physical delivery and to ensure final settlement of its delivery obligations on the applicable settlement date. While the Proposed Rule extends the operating hours of the Exchange, the settlement time for each contract remains unchanged.