

SUBMISSION COVER SHEET

IMPORTANT: Check box if Confidential Treatment is requested

Registered Entity Identifier Code (optional): _____

Organization: _____

Filing as a: **DCM** **SEF** **DCO** **SDR** Please note - only ONE choice allowed.

Filing Date (mm/dd/yy): _____ Filing Description:

SPECIFY FILING TYPE Please note only ONE choice allowed per Submission.

Organization Rules and Rule Amendments

Certification	§ 40.6(a)
Approval	§ 40.5(a)
Notification	§ 40.6(d)
Advance Notice of SIDCO Rule Change	§ 40.10(a)
SIDCO Emergency Rule Change	§ 40.10(h)

Rule Numbers: _____

New Product Please note only ONE product per Submission.

Certification	§ 40.2(a)
Certification Security Futures	§ 41.23(a)
Certification Swap Class	§ 40.2(d)
Approval	§ 40.3(a)
Approval Security Futures	§ 41.23(b)
Novel Derivative Product Notification	§ 40.12(a)
Swap Submission	§ 39.5

Official Product Name: _____

Product Terms and Conditions (product related Rules and Rule Amendments)

Certification	§ 40.6(a)
Certification Made Available to Trade Determination	§ 40.6(a)
Certification Security Futures	§ 41.24(a)
Delisting (No Open Interest)	§ 40.6(a)
Approval	§ 40.5(a)
Approval Made Available to Trade Determination	§ 40.5(a)
Approval Security Futures	§ 41.24(b)
Approval Amendments to enumerated agricultural products	§ 40.4(a), § 40.5(a)
“Non-Material Agricultural Rule Change”	§ 40.4(b)(5)
Notification	§ 40.6(d)

Official Name(s) of Product(s) Affected: _____

Rule Numbers: _____

SWAPEX™

September 8, 2014

BY ELECTRONIC MAIL: submissions@cftc.gov

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

Re: SwapEx Submission 07-14: Certification Pursuant to Commission Rule 40.6: Rule Amendments to Product Specifications

Dear Ms. Jurgens:

SwapEx, LLC (“SwapEx”) hereby notifies the Commodity Futures Trading Commission (the “Commission” or “CFTC”), pursuant to Commission Regulation 40.6(a), that it is certifying amendments to the product specifications of the 13 non-deliverable foreign exchange forwards (“NDFs”) that are currently listed for trading on SwapEx’s electronic trading system (the “Trading System”). The amended specifications will become effective on September 23, 2014. These amendments clarify and make explicit existing aspects of these products.

This submission letter contains the following attachments:

- The CFTC submission cover sheet.
- Attached as Exhibit A, a clean copy of the amended specifications, which will be published pursuant to SwapEx’s procedures for contract specifications on SwapEx’s website in accordance with SwapEx Rule 901(c).
- Attached as Exhibit B, a copy of the specifications marked to show the amendments being made to the existing version of the specifications.

SwapEx certifies that these amendments comply with the CEA and Commission Regulations thereunder. SwapEx additionally certifies that it has concurrently posted a copy of this submission letter and attachments hereto on SwapEx’s website at <http://www.swapex.com/swapex/rules-policies-and-notices/recent-rule-filings-cftc/>.

* * *

In the event that you have questions, please contact the undersigned at (312) 798-6517 or at BJRegan@statestreet.com.

Sincerely,


Brian J. Regan
Chief Compliance Officer

Encl. (Exhibits A and B)

cc: Mark Schlegel

SwapEx Contract Specifications

The Non-Deliverable Forward Contract Specifications are as follows:

Contract Structure	Notional amounts down to single currency units traded against deliverable counter currencies for a custom or standard maturity using a default or custom fixing date.
Trading Hours	Trading hours consecutive from 5:00 p.m. EST on Sunday through to Friday at 5:00 p.m. EST. Each day at 5:00 p.m. EST, SwapEx rolls the trade date.
Reference Currency (i.e., Non-deliverable currency)	ARS – Argentine Peso BRL – Brazilian Real CLP – Chilean Peso CNY – Chinese Renminbi COP – Colombian Peso IDR – Indonesian Rupiah INR – Indian Rupee KRW – South Korean Won MYR – Malaysian Ringgit PEN – Peruvian Nuevo Sol PHP – Philippine Peso RUB – Russian Ruble TWD – Taiwan Dollar
Settlement Currency	USD
Underlying Swap Tenor	The duration of time from the Effective Date to the Fixing Date. Subject to specific end date defined by user or SwapEx
Forward Rate	Currency exchange rate expressed as the amount of Reference Currency per unit of Settlement Currency. Rate negotiated at the time of execution
Contract Size	Minimum contract size is \$1.
Effective Date	The date on which the parties enter into the contract.
Maturity / Valuation Date	The date specified in the contract when the trade will be cash settled; it needs to be later than Effective Date.

Fixing Dates	The date at which the difference between the prevailing market exchange rate and the agreed upon exchange rate is calculated. The Fixing Date is defined by the counterparties at the time of entering into the contract; it needs to be earlier than Maturity / Valuation Date.
Last Trading Day for Defined (Fixed) Tenors	The last day on which the contract can be traded is the New York business day preceding the Maturity Date
Settlement Procedure	Bilateral settlement performed in settlement currency
Quoting Convention	A currency pair is the quotation of the relative value of a currency unit against the unit of another currency in the foreign exchange market. SwapEx follows market convention with regards to quoting, but allows users the flexibility with regards to whether the quantity traded is expressed in base or terms notional. NDFs can be quoted up to 6 decimal places.

In addition to the above, all of the template terms for the confirmation of an NDF transaction in the currency pair that is the subject of a particular Contract, as the term Contract is defined in SwapEx's rules, as recommended by EMTA, Inc. ("**EMTA**") or a recognized successor (such template terms in effect on the Effective Date and published and available at www.emta.org or any successor website, the "Relevant EMTA Template") shall apply to such Contract. For the avoidance of doubt, if the Relevant EMTA template becomes effective after the Effective Date of a Contract, such Relevant EMTA Template shall not apply to or amend the terms of such Contract.

SwapEx Contract Specifications

The Non-Deliverable Forward ~~contract specifications~~[Contract Specifications](#) are as follows:

~~Custom Date Non-Deliverable Forwards~~

Contract Structure	Notional amounts down to single currency units traded against deliverable counter currencies. Forward Outrights. Standard for a custom or Custom Fixing Dates standard maturity using a default or custom fixing date.
Trading Hours	Trading hours consecutive from 5:00 p.m. EST on Sunday through to Friday at 5:00 p.m. EST. Each day at 5:00 p.m. EST, SwapEx rolls the trade date.
Reference Currency (i.e., Non-deliverable currency)	ARS – Argentine Peso BRL – Brazilian Real CLP – Chilean Peso CNY – Chinese Renminbi COP – Colombian Peso IDR – Indonesian Rupiah INR – Indian Rupee KRW – South Korean Won MYR – Malaysian Ringgit PEN – Peruvian Nuevo Sol PHP – Philippine Peso RUB – Russian Ruble TWD – Taiwan Dollar
Settlement Currency	USD
Underlying Swap Tenor	The duration of time from the Effective Date to the Fixing Date. Subject to specific end date defined by user or SwapEx
Forward Rate	Currency exchange rate expressed as the amount of Reference Currency per unit of Settlement Currency. Rate negotiated at the time of execution
Contract Size	Minimum contract size is \$1.
Effective Date	The date on which the parties enter into the contract.
Maturity / Valuation Date	The date specified in the contract when the trade will be cash settled; it needs to be later than Effective Date.

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Fixing Dates	The date at which the difference between the prevailing market exchange rate and the agreed upon exchange rate is calculated. The Fixing Date is defined by the counterparties at the time of entering into the contract: <u>it needs to be earlier than Maturity / Valuation Date.</u>
Last Trading Day for Defined (Fixed) Tenors	The last day on which the contract can be traded is the New York business day preceding the Maturity Date
Settlement Procedure	Bilateral settlement performed in settlement currency
Quoting Convention	A currency pair is the quotation of the relative value of a currency unit against the unit of another currency in the foreign exchange market. SwapEx follows the market convention to determine which is with regards to quoting, but allows users the flexibility with regards to whether the <u>quantity traded is expressed in</u> base currency and which is the term currency in or terms of quoting convention, notional. NDFs can be quoted up to 6 decimal places.

In addition to the above, all of the template terms for the confirmation of an NDF transaction in the currency pair that is the subject of a particular Contract, as the term Contract is defined in SwapEx’s rules, as recommended by EMTA, Inc. (“**EMTA**”) or a recognized successor (such template terms in effect on the Effective Date and published and available at www.emta.org or any successor website, the “Relevant EMTA Template”) shall apply to such Contract. For the avoidance of doubt, if the Relevant EMTA template becomes effective after the Effective Date of a Contract, such Relevant EMTA Template shall not apply to or amend the terms of such Contract.