

March 10, 2025

Via CFTC Portal Submissions

Mr. Christopher Kirkpatrick
Secretary of the Commission
Office of the Secretariat
Commodity Futures Trading Commission
3 Lafayette Centre
1155 21st Street, N.W.
Washington D.C. 20581

RE: Rule Self-Certification: Amendments to CDNA's Liability Rule and Addition of Definitions and Rule Related to Technology Service Providers – Submission Pursuant to Commission Regulation 40.6(a)

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (the "Act"), and §40.6(a) of the regulations promulgated by the Commodity Futures Trading Commission (the "Commission") under the Act, the North American Derivatives Exchange, Inc. d/b/a Crypto.com | Derivatives North America ("CDNA" or the "Exchange"), in its capacity as a registered designated contract market ("DCM") and designated clearing organization ("DCO"), hereby certifies to the Commission amendments to CDNA's Rules 1.1 and 10.1 as well as the addition of CDNA Rule 2.11 related to service agreements with Technology Service Providers. (collectively, the "Rule Amendments") CDNA is amending its rulebook to add a definition of "Technology Services Provider" and "Technology Services Agreement" in order for service providers to provide certain technology services for CDNA. DCMs and DCOs commonly use service providers to provide technology for the exchange and clearinghouse. CDNA is adding Rule 2.11 to account for its relationships with service providers. CDNA is also updating its Rule 10.1 which relates to limitation of liability in order to reflect the current state of the Exchange.

The Rule Amendments shall become effective ten (10) business days after this submission has been filed.

Analysis of CDNA Rule Amendments Compliance With Core Principles

DCM CORE PRINCIPLES

CDNA has identified the following DCM Core Principles as being impacted by the revised Settlement Methodology: Core Principle 7 (Availability of General Information).

Core Principle 7 requires that the Exchange ensure that its Rulebook is accurate, complete, current and readily accessible to the public, and all new or amended rules, both substantive and non-substantive, shall be reflected in the Rulebook on the date of implementation. CDNA makes its Rulebook publicly available on the CDNA website. On the effective date of this submission, the Rulebook will be updated and published with the Rule Amendments. Accordingly, the Rule Amendments will not negatively affect CDNA's ability to comply with this Core Principle.

DCO CORE PRINCIPLES

CDNA has identified the following DCO Core Principles as being impacted by the revised Settlement Methodology: Core Principle L (Public Information).

Core Principle L requires a DCO make publicly available its rules in a clear and comprehensive manner. Nadex makes its Rulebook publicly available on its website, which will be updated with the additions discussed herein on the effective date. Accordingly, these amendments will not negatively affect Nadex's ability to comply with this Core Principle.

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Redlined versions of the amended Rules are attached hereto as Exhibit A.

CDNA hereby certifies that the revisions contained herein comply with the Act, as amended, and the Commission Regulations adopted thereunder. No substantive opposing views were expressed to CDNA with respect to any of these actions.

CDNA hereby certifies that notice of these amendments was posted on its website at the time of this filing.

In accordance with the 10-day review period set forth in Commission Regulation 40.6(a)(3), these Rule changes will be effective on or after March 24, 2025.

Should you have any questions regarding the above, please do not hesitate to contact me by telephone at (312) 884-0161 or by email at Kevin.Dan@nadex.com.

Sincerely,

/s/

Kevin Dan
Chief Compliance Officer

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