

October 20, 2015

**BY ELECTRONIC SUBMISSION**

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

**Re: Regulatory Services Agreement (Eris Exchange, LLC Submission #2015-09)**

Dear Mr. Kirkpatrick:

Eris Exchange, LLC (“Eris Exchange” or the “Exchange”) hereby submits for self-certification to the Commodity Futures Trading Commission (the “Commission”), under Commission regulation 40.6(a), the following Regulatory Services Agreement (“RSA”) between Eris Exchange and the National Futures Association (“NFA”). The effective date of this change will be November 4, 2015. This submission includes Exhibit A which has been filed subject to confidential treatment.

**Explanation and Analysis**

On February 11, 2011, Eris Exchange entered into a RSA with NFA. At this time the parties are amending all sections of the RSA to reflect the provision of both market and trade practice surveillance services. The changes mostly reflect universal modifications to the NFA regulatory agreement that currently already apply to other designated contract markets.

**Description of Rule Changes**

No rule changes are required.

**Core Principle Compliance**

The Exchange’s staff has identified that the following core principles applicable to designated contract markets (“Core Principles”) may be potentially impacted: Compliance with Rules, Prevention of Market Disruption, Position Limitations or Accountability, Protection of Markets and Market Participants, Disciplinary Procedures, Recordkeeping, and System Safeguards. Eris Exchange has concluded that it will continue to comply with all Core Principles and its compliance is not adversely affected by this change. The NFA will conduct industry-standard automated surveillance that complies with the standards for such systems established by the CFTC and for conduct prohibited by the Eris Exchange rulebook, which has been approved and self-certified in conformance with the Core Principles.

**Public Information**

A notice and copy of this submission has been concurrently posted on the Exchange’s website at <http://erisfutures.com/cftc-submissions>.

**Opposing Views**

There were no opposing views expressed that were not incorporated into the RSA.

**Certification**

Eris Exchange, LLC hereby certifies to the Commodity Futures Trading Commission, pursuant to the procedures set forth in the Commission regulation §40.6, that this submission complies with the Commodity Exchange Act, as amended, and the regulations promulgated thereunder.

In the event that you have questions, please contact me at the information below.

Sincerely,



Laurian Cristea  
Chief Regulatory Officer, and  
Head of Legal and Regulatory Affairs  
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**EXHIBIT A**

**Regulatory Services Agreement**

[Confidential Treatment Requested]