



Promotional Material Filing System User's Guide

Introduction

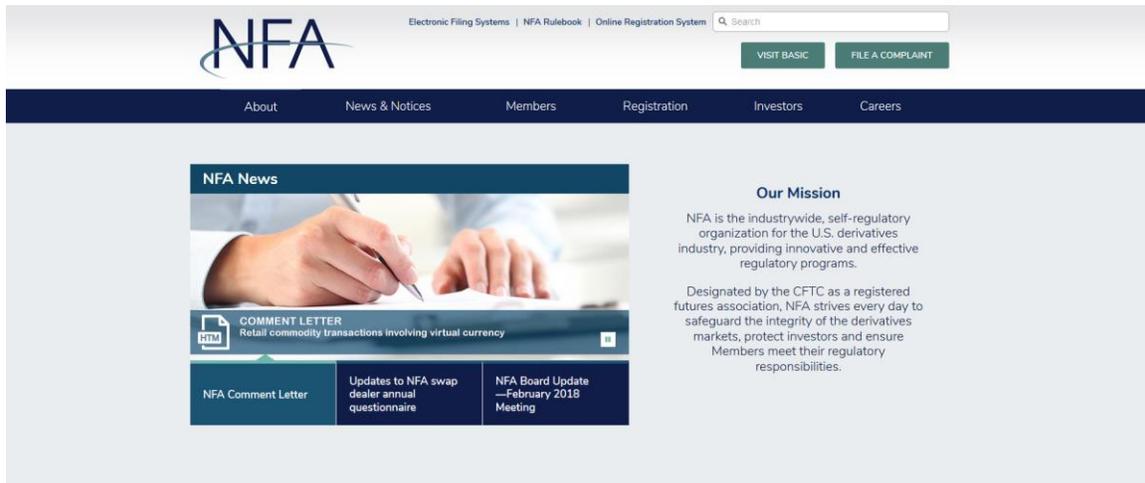
Members filing promotional material with NFA for review are required to submit their filings through NFA's Promotional Material Filing System. NFA will not accept promotional material filings through any other means.

Through NFA's system, users can track the status of their submissions online in real-time, as well as instantaneously access NFA's comment and approval letters. Additionally, all correspondence, including previously-filed promotional material and NFA's comment, no-comment, or approval letters, are archived in the system for users to access in the future.

If you have any questions about the Promotional Material Filing System or need additional assistance, please contact Derek Janik (djanik@gmail.com or 312-781-1203) or Brian Dempsey (bdempsey@nfa.futures.org or 312-781-1228).

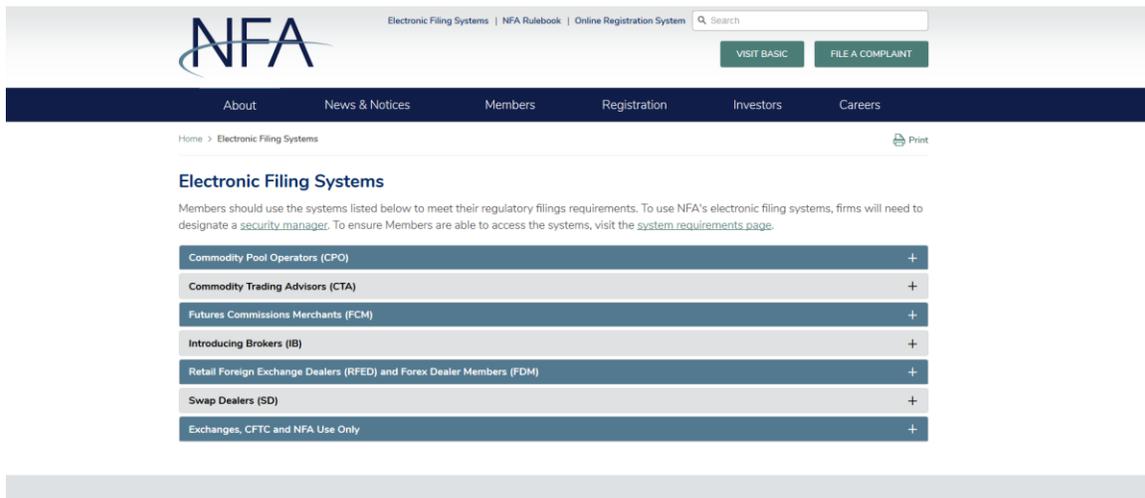
Filing Promotional Material

First, to access the Promotional Material Filing System, click the Electronic Filing Systems link at the top of any page on NFA's website.



The screenshot shows the NFA website homepage. At the top, there is a search bar and two buttons: "VISIT BASIC" and "FILE A COMPLAINT". Below the search bar is a navigation menu with links for "About", "News & Notices", "Members", "Registration", "Investors", and "Careers". The main content area features a "NFA News" section with a photo of hands writing on a document. Below the photo is a "COMMENT LETTER" link for "Retail commodity transactions involving virtual currency". To the right of the news section is a "Our Mission" section with text describing NFA's role as a self-regulatory organization for the U.S. derivatives industry. Below the mission text are three smaller links: "NFA Comment Letter", "Updates to NFA swap dealer annual questionnaire", and "NFA Board Update —February 2018 Meeting".

Then, click on the relevant Member category and click the link for the Promotional Material Filing System.



The screenshot shows the "Electronic Filing Systems" page on the NFA website. The page has a breadcrumb trail: "Home > Electronic Filing Systems". Below the breadcrumb is a "Print" icon. The main heading is "Electronic Filing Systems". Below the heading is a paragraph of text: "Members should use the systems listed below to meet their regulatory filings requirements. To use NFA's electronic filing systems, firms will need to designate a [security manager](#). To ensure Members are able to access the systems, visit the [system requirements page](#)." Below the text is a table with seven rows, each representing a member category and a plus sign to its right:

| | |
|---|---|
| Commodity Pool Operators (CPO) | + |
| Commodity Trading Advisors (CTA) | + |
| Futures Commissions Merchants (FCM) | + |
| Introducing Brokers (IB) | + |
| Retail Foreign Exchange Dealers (RFED) and Forex Dealer Members (FDM) | + |
| Swap Dealers (SD) | + |
| Exchanges, CFTC and NFA Use Only | + |

You'll then be taken to a login page, where you will enter your EasyFile credentials. Once you've entered your username and password, click "Log In" to enter the system.

Please note that, in order to access the Promotional Material Filing System, your firm's Security Manager must first provide you the necessary permissions to File Promotional Material. If you attempt to log into the system but do not have the necessary permissions, you'll receive a message requesting that you contact your firm's Security Manager.



NFA System Login - Easy File Plus

Please log in with your username and password to access the Easy File Plus system.

| | | |
|---------------------------------------|--------------------------|------------|
| User Name | <input type="text"/> | * Required |
| Password | <input type="password"/> | |
| <input type="button" value="Log In"/> | | |

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Upon entry, you'll arrive at this page, which offers details about using the system. To continue, click "Next."



Promotional Material Filing System

Welcome to the Promotional Material Filing System

The Promotional Material Filing System will allow you to file your promotional material for review electronically, determine the status of the review of previously filed promotional material, and give you the ability to view NFA's comments immediately upon issuance.

Before you start the filing process, you should have a copy of the promotional material available as you will be required to enter certain information specific to the material you are submitting for review.

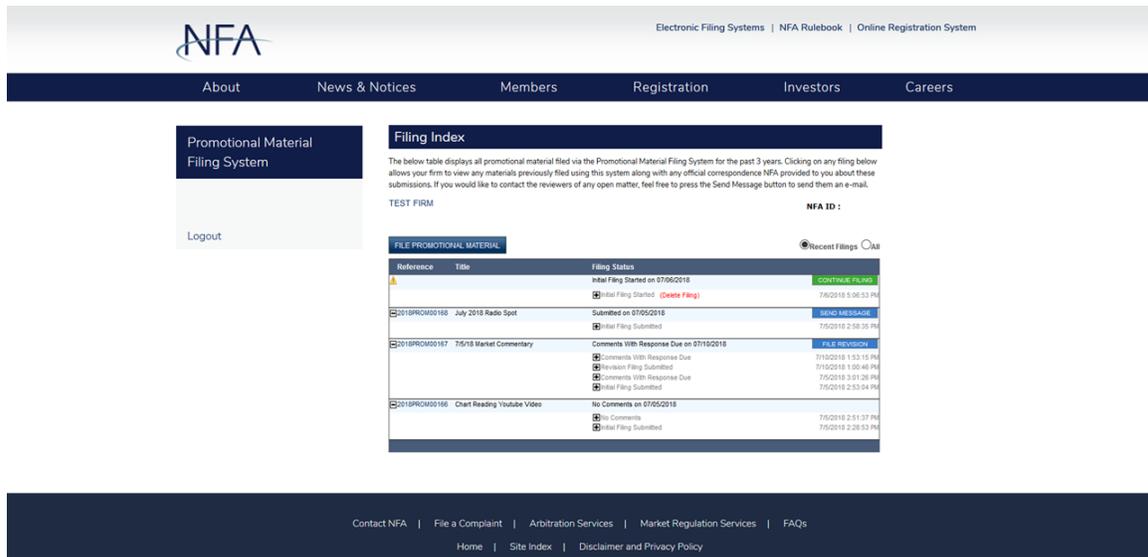
To start the filing process, you must proceed to the Filing Index by clicking the NEXT button. The Filing Index will only reflect promotional material submissions that you have made through the system. If you need to leave the filing at any time during the submission process, you should save your progress by clicking Save. If you wish to delete a filing you have started, you can click on Delete Filing at the top of the page or from the Filing Index.

Help Text is available at any time during the filing process. You may click on the  icon next to any question to obtain specific guidance or the Help menu at the top of the page.

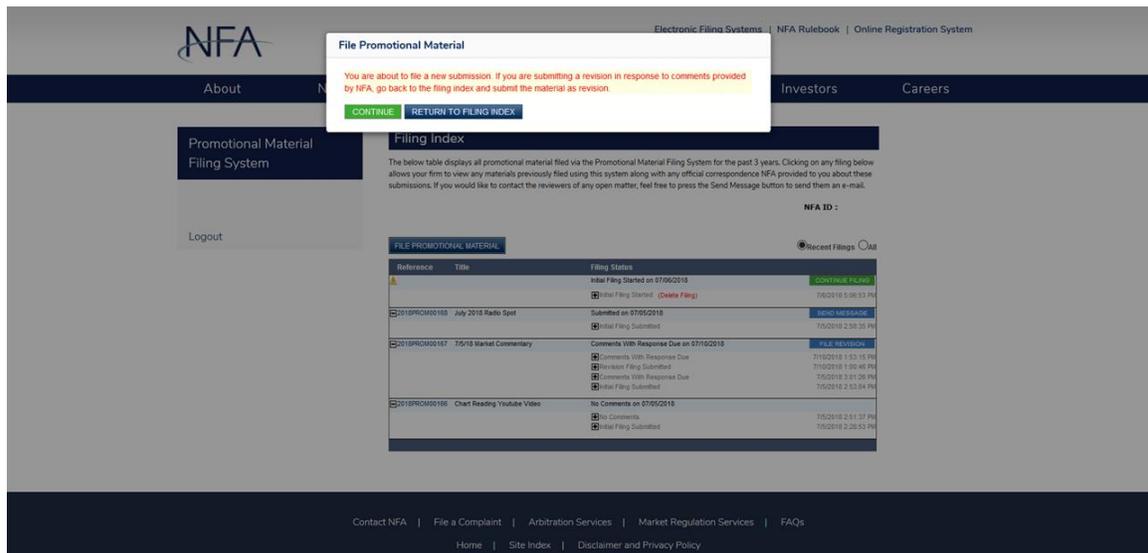
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This is the Promotional Material Filing Index. Note that the Filing Index will be blank when you enter the system for the first time. Going forward, all filings made through the system during the previous three years will appear in the Filing Index. From here, you'll be able to submit a filing, submit revisions to previous filings, delete in-progress filings, continue submission of incomplete filings, and track the status of previously-submitted filings. Please note that any submissions that were filed via email prior to the launch of this system will not appear in this index and will continue to be handled via email through completion. Going forward, all new submissions must be made through the system.

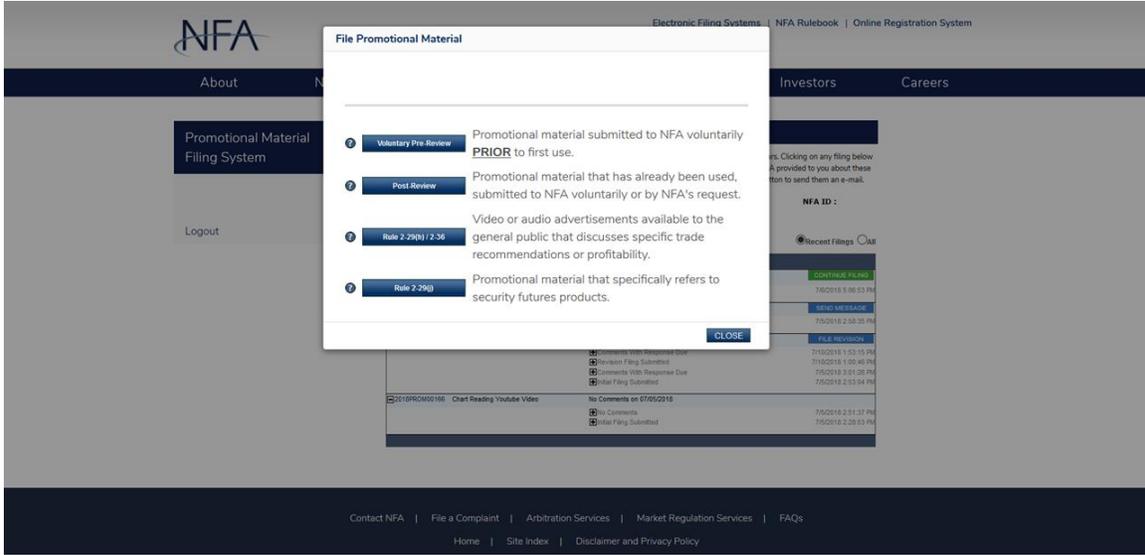
Before beginning a filing, be sure to have a copy of all promotional material being filed on hand, as you'll need to reference it throughout the filing process. To submit a new filing to NFA, click the "File Promotional Material" button.



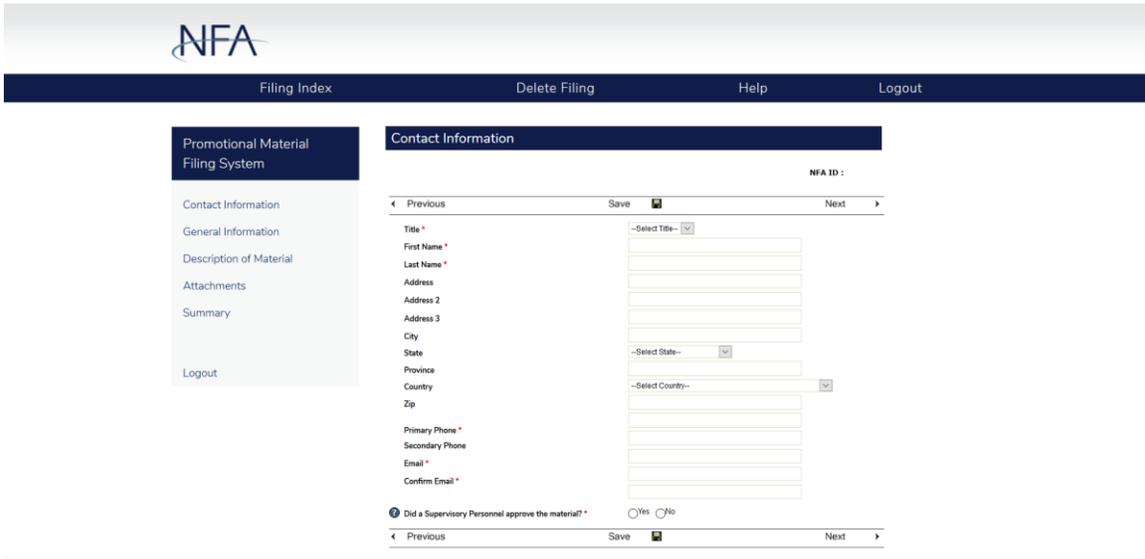
You'll then see a pop-up requesting that you confirm you're submitting a new filing. If this is not the case and, instead, you're submitting a revision to a previous filing, you'll have the option to click "Return to Filing Index." Once back at the Filing Index, you will be able to select the option to file a revision. Here I'm going to file a new submission. To move forward, click "Continue."



Next, you'll be presented with a series of reasons for filing promotional material: voluntary pre-review, post-review, Rule 2-29(h) or 2-36(h) review, or Rule 2-29(j) review. In the system, you'll find a brief description of these different types of filing options for easy reference. For additional details on each of these types of filings, click the question mark icons next to each button. Select the appropriate reason.



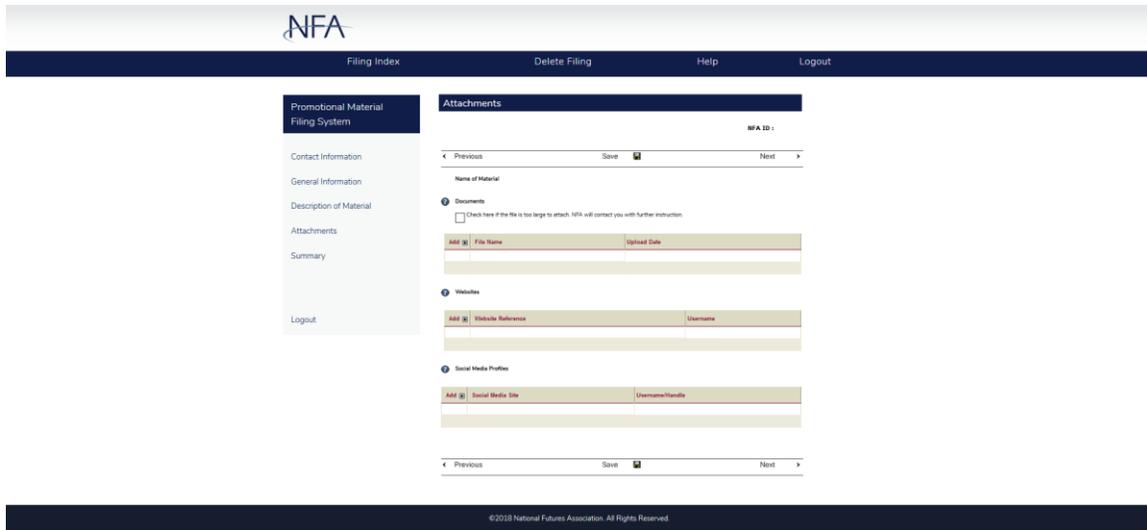
Upon selecting the type of promotional material you're submitting, you'll arrive at the Contact Information form. Contact information should be provided for the individual who will be the primary firm contact during the review process. This form will be automatically populated with the contact information of the person submitting the filing, but it can be changed to someone else if you prefer. Fields marked with an asterisk are required. Complete this form and click "Next."



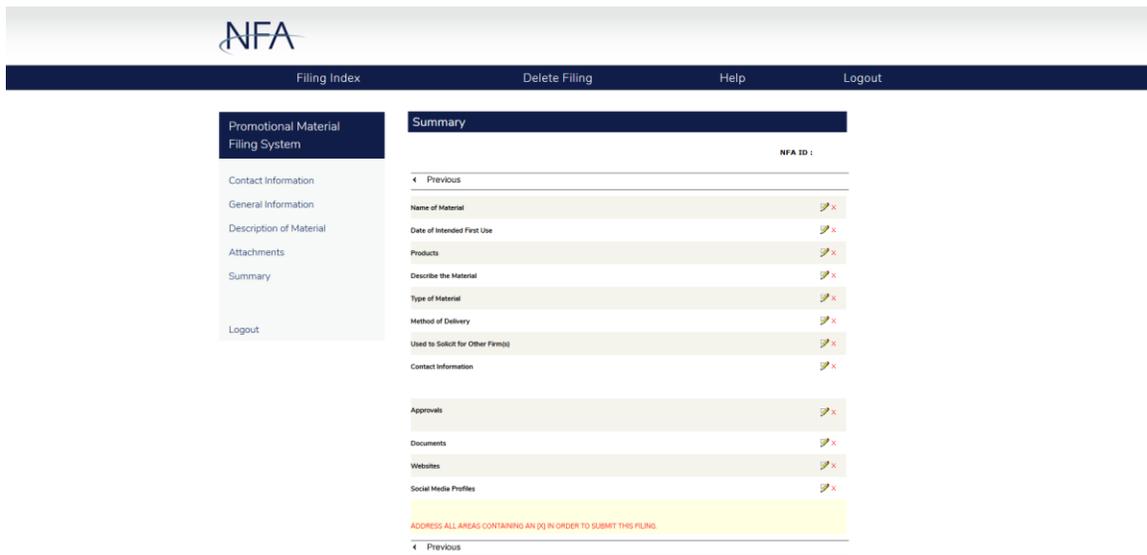
Next, you will be asked to provide general information about the promotional material you're submitting, such as the name of the piece, the date of its intended first use, and the products that are being offered. Since we are selecting to submit material for voluntary pre-review, the date of intended first use should be at least 14 days in the future. Complete the fields that appear, and then click "Next."

You'll then be required to provide a brief description of the promotional material you're submitting, along with the type of material—such as a PowerPoint presentation or a social media posting—as well as the method of delivery—such as an in-person presentation or a social media platform. Again, complete the fields that appear, and then click "Next."

Next, you'll attach your promotional material files. To attach a file, click "Add" under the appropriate material type. The system accepts most commonly used text, image, audio, video, and other file types. For example, if I were submitting a PowerPoint presentation, I would click "Add" under "Documents" and upload the file. If the file you are attempting to attach is too large, click the "File is too large to attach" checkbox. NFA will contact you with further instructions on how to submit the file. If you are submitting a website or social media profile for review, the system also provides you the ability to submit web addresses or social media usernames. Once you've uploaded your files, click "Next."



Finally, you'll arrive at a summary of your filing, which contains all the information you've input. Here, you will review and confirm that the information is accurate by clicking the "Submit Filing" button at the bottom of the page. If you need to edit any information you've input, click the "Edit" icon in the right hand column. If a red X appears in the right hand column, this indicates that information is missing and must be addressed prior to submission. Clicking the icon to the left of the red X will take you back to the applicable section for completion.



Upon submission, you will receive a notification that your submission has been received by NFA. The notification will include a matter reference number for the filing. At this point, you may click on the Filing Index button to return to the Filing Index where you can see your filing reflected.



Promotional Material Filing System

Promotional Material Filing

This is a confirmation that NFA has received your promotional material filing (2018PROM00169). NFA will contact you once the review of your filing has been completed. If you have any other questions relating to this filing, please send a message through the Filing Index page.

[Filing Index](#)

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Upon submission, the filing is automatically assigned to NFA staff for review. The length of the review process depends on the type of material you have filed. For example, material filed for pre-approval will be reviewed within 10 calendar days of receipt, and material submitted for voluntary pre-review will be reviewed within 14 calendar days of filing. Review of material filed under the post-review option may take longer depending on the size of the filing.

Once the material is reviewed, you will receive an email notification alerting you to check the Filing Index in the system. There, under the applicable filing, you will see either correspondence from NFA indicating that the firm can use the material or a comment letter outlining deficiencies noted by NFA that must be corrected prior to use. To access the correspondence, click the plus icon to the left of the filing status.



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Promotional Material Filing System

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Filing Index

The below table displays all promotional material filed via the Promotional Material Filing System for the past 3 years. Clicking on any filing below allows your firm to view any materials previously filed using this system along with any official correspondence NFA provided to you about these submissions. If you would like to contact the reviewers of any open matter, feel free to press the Send Message button to send them an e-mail.

NFA ID :

| Reference | Title | Filing Status | |
|---------------|-----------------------------|--|-------------------------------|
| 2018PROM00169 | PowerPoint for Pre-Review | Submitted on 07/12/2018 | SEND MESSAGE |
| | | Initial Filing Submitted | 7/12/2018 10:35:57 AM |
| 2018PROM00169 | July 2018 Radio Spot | Submitted on 07/05/2018 | SEND MESSAGE |
| | | Initial Filing Submitted | 7/5/2018 2:58:35 PM |
| 2018PROM00167 | 7/5/18 Market Commentary | Comments With Response Due on 07/10/2018 | FILE REVISION |
| | | Comments With Response Due | 7/10/2018 1:51:15 PM |
| | | Revision Filing Submitted | 7/10/2018 1:50:46 PM |
| | | Comments With Response Due | 7/5/2018 1:31:28 PM |
| | | Initial Filing Submitted | 7/5/2018 2:53:04 PM |
| 2018PROM00166 | Chart Reading Youtube Video | No Comments on 07/05/2018 | |
| | | No Comments | 7/5/2018 2:51:37 PM |
| | | Initial Filing Submitted | 7/5/2018 2:28:53 PM |

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In order to file a revision in response to comments issued by NFA—or to amend a filing that was previously submitted—click the "File Revision" button that appears in the index. You will then be asked to provide a reason for the revision. Upon submitting a reason and clicking "Next," you will be taken to the Attachments page where you can upload any revised material and update any other information related to the filing. To submit the filing, continue to the Summary page. Once NFA receives the revision, staff will review the material.

Please note that you will not be able to delete any previously-submitted material. If, after receiving notification of a comment letter, you decide to no longer use previously-submitted material, you must notify NFA by clicking the "File a Revision" button and uploading a letter representing that the material will not be used. Once the letter has been reviewed by NFA staff, the Filing Index will reflect that the filing has been withdrawn.

Also note that you have the ability to send a message to NFA staff at any time during the review process by clicking the "Send Message" button, which is available in the Filing Index. By clicking "Send Message," you can enter your e-mail address and a message for the NFA staff who are reviewing your submission. Once review of a submission is complete and correspondence has been issued, this button no longer appears.