

February 22, 2017

Via Federal Express

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

Re: National Futures Association: Forex Dealer Member Chief Compliance Officer Annual Report Filing Deadline – NFA Compliance Rule 2-36: Requirements for Forex Transactions*

Dear Mr. Kirkpatrick:

Pursuant to Section 17(j) of the Commodity Exchange Act ("CEA"), as amended, National Futures Association ("NFA") hereby submits to the Commodity Futures Trading Commission ("CFTC" or "Commission") the proposed amendment to [NFA Compliance Rule 2-36](#). NFA's Board unanimously approved the proposed amendment on February 16, 2017.

NFA is invoking the "ten-day" provision of Section 17(j) of the CEA and plans to make this proposal effective ten days after receipt of this submission by the Commission unless the Commission notifies NFA that the Commission has determined to review the proposal for approval.

PROPOSED AMENDMENT
(additions are underscored and deletions are ~~stricken through~~)

COMPLIANCE RULES

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**Part 2 – RULES GOVERNING THE BUSINESS CONDUCT OF MEMBERS
REGISTERED WITH THE COMMISSION**

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RULE 2-36. REQUIREMENTS FOR FOREX TRANSACTIONS

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(j) FDM Chief Compliance Officer

Each Forex Dealer Member shall designate one principal to serve as Chief Compliance Officer (CCO). Each CCO must prepare an annual report that meets the requirements of CFTC Regulation 3.3(e) and must provide the annual report to the Forex Dealer Members Board of Directors or Senior Officer. Each Forex Dealer Member must submit the annual report to NFA within ~~60~~ 90 days after the Forex Dealer Member's fiscal year end. The annual report must include a certification by the Forex Dealer Member's CCO or chief executive officer that to the best of his or her knowledge and reasonable belief, and under penalty of law, the information contained in the annual report is accurate and complete.

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EXPLANATION OF PROPOSED AMENDMENT

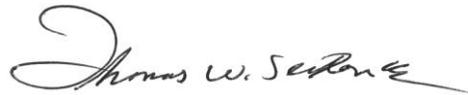
NFA Compliance Rule 2-36 sets forth requirements for Forex Dealer Members ("FDM"), including deadlines for filing FDM Chief Compliance Officer ("CCO") annual reports. Specifically, NFA Compliance Rule 2-36(j) requires each FDM to prepare a CCO annual report that meets the requirements of CFTC Regulation 3.3(e) and to submit the report to NFA within 60 days of its fiscal year end. NFA imposed a 60-day filing deadline for FDMs to remain consistent with the CCO annual report filing deadline for Futures Commission Merchants ("FCMs") and Swap Dealers ("SDs") set forth in CFTC Regulation 3.3. In November 2016, the CFTC issued a final rule amending CFTC Regulation 3.3 to permit FCMs and SDs to file the CCO annual report within 90 days of the firm's fiscal year end. Accordingly, the proposed amendment to NFA Compliance Rule 2-36(j) is necessary to keep the CCO annual report filing deadline for FDMs consistent with the CCO annual report filing deadline for FCMs and SDs set forth in CFTC Regulation 3.3.

Mr. Christopher J. Kirkpatrick

February 22, 2017

As mentioned earlier, NFA is invoking the “ten-day” provision of Section 17(j) of the CEA. NFA intends to make the proposed amendments effective ten days after receipt of this submission by the Commission, unless the Commission notifies NFA that the Commission has determined to review the proposals for approval.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas W. Sexton". The signature is fluid and cursive, with a long horizontal stroke at the end.

Thomas W. Sexton
Senior Vice President and
General Counsel

*The proposed amendment to NFA Compliance Rule 2-36 became effective March 29, 2017.