

February 24, 2014

**Via Federal Express**

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

Re: National Futures Association: FCM and IB Regulations - Proposed  
Amendments to NFA Compliance Rule 2-26 to Incorporate CFTC Risk  
Management Program Requirement for FCMs \*

Dear Ms. Jurgens:

Pursuant to Section 17(j) of the Commodity Exchange Act, as amended, National Futures Association (“NFA”) hereby submits to the Commodity Futures Trading Commission (“CFTC” or “Commission”) the proposed amendments to NFA Compliance Rule 2-26 to incorporate the CFTC’s Risk Management Program Requirement for FCMs. NFA’s Board of Directors (“Board”) approved the proposal on February 20, 2014.

NFA is invoking the “ten-day” provision of Section 17(j) of the Commodity Exchange Act (“CEA”) and will make these proposals 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.

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**PROPOSED AMENDMENTS**  
**(additions are underscored)**

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**COMPLIANCE RULES**

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

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**RULE 2-26. FCM AND IB REGULATIONS.**

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Any Member or Associate who violates any of CFTC Regulations 1.11, 1.33, 1.55, 1.56, 1.57, 1.65, 155.3, or 155.4, as applicable, shall be deemed to have violated an NFA Requirement.

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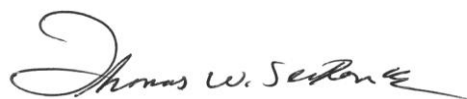
### EXPLANATION OF PROPOSED AMENDMENTS

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CFTC Regulation 1.52(c)(1) requires NFA to adopt rules prescribing risk management requirements for FCMs that are the same or more stringent than the requirements contained in CFTC Regulation 1.11. In order to incorporate these requirements into NFA's Rules, NFA is amending NFA Compliance Rule 2-26 to specify that any Member that violates CFTC Regulation 1.11, as applicable, will be deemed to have violated an NFA Requirement. This is consistent with NFA's enforcement of a number of other CFTC regulations. FCMs are currently required to file their initial risk management program with the Commission and the FCM's DSRO by July 12, 2014. The amendment to NFA Compliance Rule 2-26 will become effective at that time or such later time as set by the Commission.

As mentioned earlier, NFA is invoking the "ten-day" provision of Section 17(j) of the Commodity Exchange Act. NFA intends to make the proposed amendments to NFA Compliance Rule 2-26 to incorporate the CFTC's Risk Management Program Requirement for FCMs 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.

Respectfully submitted,



Thomas W. Sexton  
Senior Vice President and  
General Counsel

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\* Will go into effect on July 12, 2014