

July 1, 2022

**VIA CFTC PORTAL**

Commodity Futures Trading Commission  
Attention: Chris Kirkpatrick, Secretary  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, NW  
Washington, DC 20581

**Re: CFTC Regulation 40.6(a) Certification: Amendment to Nodal Clear Cash Management Fee Advisory**

Dear Mr. Kirkpatrick:

Pursuant to Commodity Futures Trading Commission (“Commission” or “CFTC”) Regulation 40.6(a), Nodal Clear, LLC (“Nodal Clear” or “Clearing House”) hereby notifies the Commission that it is self-certifying an amendment to its Cash Management Fee Advisory (the “Advisory”).<sup>1</sup> The Advisory is attached hereto and indicates the specific text that is being amended. The Advisory shall become effective on July 18, 2022.

The Advisory notifies Clearing Members that as of August 1, 2022, the cash management fee on House and Customer Initial Margin will be waived if the average Secured Overnight Financing Rate for the respective calendar month is at or above 50 basis points (0.50%). The process for reporting the cash management fee to Clearing Members is being removed as such process is in place.

Nodal Clear management has assessed the Advisory and its compliance with applicable provisions of the Commodity Exchange Act (“CEA”), including the Commission’s Regulations and DCO Core Principles. Nodal Clear has identified that the Advisory may have some bearing on the following Core Principles:

Core Principle B – Financial Resources: The Advisory will not impact Nodal Clear’s ability to discharge its financial, operational, or managerial responsibilities as a DCO.

Core Principle F – Treatment of Funds: The Advisory is consistent with rules and procedures designed to protect customer funds.

Core Principle L – Public Information: As required by Core Principle L, Nodal Clear is publicly posting this self-certification letter on its website to ensure that market participants receive advance notice of the Advisory. On the effective date, the Advisory will be posted on the fee page of the Nodal Clear website.

Pursuant to Section 5c(c)(1) of the CEA and the Commission’s Regulation 40.6(a), Nodal Clear certifies that the Advisory complies with the CEA and the Commission’s Regulations thereunder. Nodal Clear is not aware of any opposing views expressed regarding the Advisory. Nodal Clear certifies that this submission has been concurrently posted on the Nodal Clear website at [www.nodalclear.com](http://www.nodalclear.com).

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<sup>1</sup> Capitalized terms not defined herein have the meaning set forth in the Nodal Clear Rulebook.

If you have any questions or need additional information regarding this submission, please contact me at 703-962-9864 or [alvarez@nodalexchange.com](mailto:alvarez@nodalexchange.com).

Sincerely,

/s/Cody Alvarez

Cody Alvarez  
Chief Compliance Officer  
Corporate Counsel

Attachments:  
Advisory (redline)