

QC Clearing LLC
7251 W. Palmetto Park Road
Suite 302
Boca Raton, Florida 33433

Via CFTC Portal

February 3, 2025

Mr. Christopher Kirkpatrick
Commodity Futures Trading Commission
1155 21st Street NW
Three Lafayette Centre
Washington, DC 20581

Re: QC Clearing 40.6(a) Rule Submission QCC.2025.1

Dear Mr. Kirkpatrick,

In accordance with Commodity Futures Trading Commission (“Commission”) Regulation 40.6(a), QC Clearing LLC (“QC Clearing”), a derivatives clearing organization registered with the Commission, hereby submits for self-certification the attached QCEX Market Oversight Manual (the “Manual”), which has been revised to incorporate a new policy, the QCEX Policy and Controls for ACH Transactions (“Policy”). Additionally, the Manual includes conforming changes to align with the QCEX Compliance Manual and Code of Conduct. The Policy will be implemented through the separately attached Member Property Account Agreements (“Agreements”). The Manual is attached as Exhibit A, and the Agreements are attached as Exhibit B and Exhibit C, respectively. The Manual and Agreements shall become effective on February 18th, 2025. Terms used in this notice with initial capital letters but not defined herein shall retain the definitions assigned to them in the QCEX Rulebook.

The following is a concise explanation and analysis of the revisions to the Manual and related Agreements, and their compliance with applicable provisions of the Commodity Exchange Act (CEA), including the Core Principles and the Commission’s Regulations. QC Clearing has established this Policy and related Agreements to effectively manage risks associated with ACH transactions that QC Clearing will process on behalf of each designated contract market that contracts with QC Clearing for clearing services.

The Policy and Agreements align with the requirements of DCO Core Principle F and Commission Regulation 39.15 by enabling QC Clearing to appropriately manage risks associated with ACH transactions and further enhance the protection of customer funds held at the Clearinghouse Settlement Bank. The Policy and Agreements further align with Core Principle D

and Commission Regulation 39.13 by putting in place procedures to cover potential ACH returns and reversals, protecting the DCO's financial resources and its clearing members.

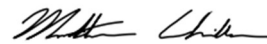
QC Clearing hereby certifies to the CFTC, pursuant to the procedures set forth in Commission Regulation 40.6, that the attached submission complies with the CEA, as amended, and the regulations promulgated thereunder. Further, QC Clearing is not aware of any substantive opposing views expressed regarding the Policy or related Agreements.

QC Clearing additionally certifies that, simultaneously with this filing, a copy of this submission was published on QC Clearing's website, and is accessible at: www.qcex.com

Please contact me using the information below if you have any questions regarding this notice.

Matthew Childers
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Phone: 754-300-9823
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Sincerely,



Matthew Childers
Chief Compliance Officer
QC Clearing LLC