



January 13, 2021

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

VIA ELECTRONIC SUBMISSION

Re: Commodity Futures Trading Commission Rule 40.11 Review of Proposed RSBIX NFL Futures Contracts (Industry Filing 20-004)

Dear Mr. Kirkpatrick:

We have read the questions that the CFTC is raising as it relates to RSBIX NFL Futures Contracts, and we write to convey our support for the listing of these contracts.

First, we would like to point out that sportsbooks are now able to operate legally, under current Native American, state and federal law, in our home state of New York. Twenty-five states and the District of Columbia currently host or have passed laws or referenda permitting sports betting. As a licensed sportsbook, we operate in full compliance with all applicable laws and regulations. We believe that nothing about our business, nor the RSBIX NFL Futures Contracts, is "unlawful under any State or Federal Law," as described in Commission regulation 40.11(a)(1).

Second, the RSBIX NFL Futures Contracts will serve an important economic purpose for our industry by allowing regulated sportsbooks to better manage economic risk. These contracts are not bets or wagers by any measure; rather they will allow our industry access to the same kinds of valuable hedging tools that are used by many other industries.

We urge the Commission to determine that the listing of these contracts is in the public interest.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "JC Crane", written over a horizontal line.

Jason Crane
Seneca Gaming Corporation
Senior Vice-President & General Counsel