



National Basketball Association

January 28, 2021

By Electronic Submission

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

Re: Proposed RSBIX NFL Futures Contracts

Dear Mr. Kirkpatrick:

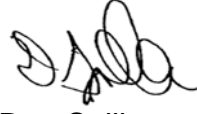
The National Basketball Association (“NBA”) submits this letter in response to the Commodity Futures Trading Commission’s (“Commission”) request for public comment on the Commission’s review of the RSBIX NFL futures contracts self-certified by Eris Exchange, LLC (“ErisX”).

The NBA supports the position taken by the NFL in a letter submitted to the Commission today on this topic: if the Commission is considering approving these futures contracts, any such approval should be postponed to permit more in-depth examination and analysis of the important questions that are implicated by these offerings. The NFL’s submission identifies core questions that should inform this continued study, and we urge the Commission to pursue them in its review. Although the contracts currently under review involve only NFL contests, ErisX’s stated justification for the NFL futures contracts applies with equal force to the contests of all major United States sports leagues, and ErisX’s own filing implies that it might seek to offer similar futures contracts related to NBA games in the future.

Additionally, we would like to correct the record regarding the statement in ErisX’s December 14, 2020 filing regarding “Sports Association Support for the Contracts” that references the NBA. The NBA did not authorize ErisX to make any representation of its position with respect to these futures contracts. Our position on the matter is set forth above.

Thank you for taking these comments into consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dan Spillane', with a stylized flourish at the end.

Dan Spillane
Senior Vice President &
Assistant General Counsel,
League Governance & Policy