



August 18, 2025

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

RE: CFTC Request for Input on Listing of Spot Crypto Asset Contracts

Dear Commissioners,

tastyfx LLC ("tastyfx" or "the firm") respectfully submits this comment in response to the Commission's request for input on listing spot crypto asset contracts. As a registered Retail Foreign Exchange Dealer ("RFED") and Introducing Broker ("IB") with the Commodity Futures Trading Commission ("CFTC") and Forex Dealer Member ("FDM") with the National Futures Association ("NFA"), tastyfx brings substantial market experience to this critical regulatory discussion.

About tastyfx

tastyfx, a subsidiary of IG Group Holdings plc, has successfully served retail investors in the spot forex market since 2018. Our track record demonstrates our commitment to exceptional service, innovative products, and comprehensive risk protections for retail customers engaged in spot forex trading. This experience positions us uniquely to contribute meaningful insights on crypto asset regulation.

Recommendation: Leverage Existing Forex Market Structure

We strongly recommend that the CFTC extend its proven forex regulatory framework to encompass spot cryptocurrency trading and allow RFEDs and Futures Commission Merchants ("FCM") to offer certain cryptocurrencies in the same manner as currently done with fiat currencies. This approach offers the most efficient path forward while maintaining robust consumer protections. This approach differs from the designation of cryptocurrency as a commodity, and therefore being traded as a commodity contract on a Designated Contract Market.

Strategic Rationale

Cryptocurrencies and fiat currencies share fundamental characteristics that make regulatory alignment and designation both logical and practical:

- **Functional Similarity:** Both serve as mediums of exchange and stores of value
- **Market Structure:** Similar trading patterns, customer bases, and operational frameworks

tastyfx LLC
1330 West Fulton Street, Suite 610
Chicago, IL 60607

tastyfx is a trading name of tastyfx LLC (a company registered in Delaware under number 6570306). tastyfx is formerly known as IG US. tastyfx LLC is a registered Retail Foreign Exchange Dealer (RFED) and Introducing Broker (IB) with the Commodity Futures Trading Commission and member of the National Futures Association (NFA ID 0509630).



- **Risk Profiles:** While crypto traditionally exhibits higher volatility, existing forex risk management protocols can be enhanced to address these differences

We acknowledge that cryptocurrencies differ significantly from fiat currencies in structure, governance, and operational principles. However, these differences do not preclude effective regulation under an adapted forex framework – they simply require thoughtful calibration of existing requirements.

Implementation Framework

Operational Integration

Under this approach, registered RFEDs and FCMs could immediately offer spot crypto using established forex pair structures:

- Bitcoin/USD (BTC/USD)
- Bitcoin/EUR (BTC/EUR)
- Ethereum/USD (ETH/USD)
- Other major forex currencies paired with major cryptocurrencies

Regulatory Continuity

As CFTC Acting Chairman Caroline D. Pham noted in her March 2025 *International Banker* article¹, the Commission's existing jurisdiction and infrastructure can be seamlessly extended to spot crypto markets. This leverages:

- Proven regulatory mechanisms
- Established compliance frameworks
- Existing market surveillance capabilities
- Current supervisory requirements

Enhanced Consumer Protection

The forex regulatory framework already provides comprehensive customer protections that would directly benefit crypto investors:

Financial Safeguards

- Customer fund segregation requirements (FCMs)
- Robust financial reporting standards
- Capital adequacy requirements

Operational Controls

- Comprehensive Risk Management Programs
- Employee supervision and trading system oversight
- Market abuse detection and prevention
- Anti-Money Laundering compliance

¹ Pham, Caroline D. "Single Market? A Simple Market Is the Key to US Markets' Success." *International Banker*, 3rd March 2025, <https://internationalbanker.com/finance/single-market-a-simple-market-is-the-key-to-us-markets-success/>.



Transparency Measures

- Multiple disclosure documents
- Clear promotional material standards
- Standardized sales practice requirements
- Appropriate margin requirements

Pricing and Risk Management

RFEDs and FCMs offering forex trading excel at multi-source price discovery, aggregating data from numerous venues to deliver competitive pricing. This capability would enhance crypto market efficiency while maintaining the counterparty model that has proven effective in forex markets.

The NFA's established framework for setting minimum security deposits can be readily adapted for cryptocurrencies, with the inclusion of cryptocurrencies in existing NFA Financial Section 12 providing the necessary regulatory structure.

Conclusion

The forex market regulatory framework represents a mature, battle-tested approach to overseeing similar financial products. Extending this framework to spot crypto assets would:

- **Accelerate market development** by eliminating redundant registration processes
- **Enhance consumer protection** through proven safeguards
- **Leverage existing expertise** within the CFTC and industry
- **Promote market integrity** through established surveillance mechanisms

tastyfx stands ready to participate in technical working groups or additional discussions to refine this approach. We firmly believe that building upon the forex regulatory foundation offers the most practical path toward bringing cryptocurrencies under appropriate CFTC oversight while fostering innovation and protecting consumers.

Thank you for considering our perspective. We welcome the opportunity to discuss these recommendations further.

Respectfully,

A handwritten signature in black ink, appearing to read "Th Johnson", written in a cursive style.

Thomas Johnson
Chief Compliance Officer
tastyfx LLC

tastyfx LLC
1330 West Fulton Street, Suite 610
Chicago, IL 60607

tastyfx is a trading name of tastyfx LLC (a company registered in Delaware under number 6570306). tastyfx is formerly known as IG US. tastyfx LLC is a registered Retail Foreign Exchange Dealer (RFED) and Introducing Broker (IB) with the Commodity Futures Trading Commission and member of the National Futures Association (NFA ID 0509630).