

**Testimony of Jeff Miller**

**EVP, Communications, Public Affairs & Policy, Player Health & Safety**

**National Football League**

**Before the House Committee on Agriculture**

**House of Representatives**

**Thursday, December 11, 2025**

***RE: “CFTC Reauthorization: Stakeholder Perspectives”***

There is no greater priority for the National Football League (“NFL”) than protecting the integrity of our games. Our fans deserve confidence that games are free from improper influences, and our players, coaches, and personnel deserve protection from unfair allegations relating to sports gambling or manipulation.

We welcome the opportunity to provide this written testimony to the House Agriculture Committee to express concerns regarding the potential impact of sports-related events contracts on the integrity of our games. Since our August 2024 comment in response to the Commodity Futures Trading Commission’s (CFTC’s) proposed amendments to §§ 40.11 of the Commodity Exchange Act, these concerns have only intensified given recent sports betting scandals affecting professional and college sport. As Commissioner Goodell recently discussed at a public forum, the league has no plans to participate in prediction markets due to several outstanding legal, regulatory, and commercial concerns on how these markets operate and the possible impact on the integrity of sporting events.

We are particularly troubled that several sports-related futures contracts have been launched nationwide, including in jurisdictions where sports betting has not been legalized. These contracts fall outside the purview of state regulatory authorities and the safeguards they impose upon the industry, including information-sharing requirements, integrity monitoring, prohibitions on easily manipulated markets, official league data requirements, know-your-customer protocols, and problem gambling resources. For example, just this past weekend, one prediction market exchange was accepting bets on whether or not “concussion protocol,” “late hit,” or “roughing the passer” would be mentioned during the broadcast. Congress and the CFTC should prohibit these and other types of objectionable bets among the many consumer and integrity protective measures needed before sports-related events contracts are legalized.

The amounts potentially wagered through unregulated gaming contracts markets could significantly exceed those in regulated sports betting markets, creating substantially greater risks to contest integrity. Without the comprehensive regulatory framework that now exists in 39 states and the District of Columbia, these products could be susceptible to manipulation or price distortion. In each of these state-regulated markets, regulators and state legislators closely

monitor betting activity and, with input from professional sports leagues, can determine which bets and wager levels are acceptable. Those guardrails do not exist in prediction markets.

We would welcome the opportunity to work with the House Agriculture Committee and the CFTC to understand whether the game integrity safeguards that exist in regulated sports betting markets can be effectively implemented on self-regulated exchanges under the regulatory purview of the CFTC. Until such time that professional sports leagues and fans can be certain that effective game integrity and consumer protection measures can be enforced, sports-related events contracts should not be approved by the CFTC and Congress should consider clarifying the definition of “gaming” contracts in the prohibited categories of the Commodity Exchange Act.

The NFL appreciates the House Agriculture Committee’s consideration of these critical matters and remains available for further discussion.