

Kieron Nolan Chief Executive Officer

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October 23, 2019

Submitted via email: secretary@cftc.gov

Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: iSwap Euro B.V. - Application for Registration as a Swap Execution Facility

Dear Secretary,

iSwap Euro B.V. ("iSwap Euro") hereby submits a Form SEF and accompanying exhibits (the "Application") for registration as a Swap Execution Facility ("SEF") pursuant to Section 5h of the Commodity Exchange Act and Part 37 of the Commodity Futures Trading Commission ("Commission") Regulations.

The Application consists of the following: this transmittal letter; an introductory letter; a table of contents; the Form SEF; the accompanying Exhibit A through Exhibit V, which have either been designated as "Non-Confidential" or "FOIA Confidential Treatment Requested by iSwap Euro BV Pursuant to 17 C.F.R. Part 145," and a petition for confidential treatment, which is being submitted simultaneously to the Assistant Secretary of the Commission for Freedom of Information.

Request for registration as a SEF

iSwap Euro hereby requests that the Commission issues an order granting iSwap Euro registration as a SEF pursuant to Commission Regulation 37.3(b).

Pursuant to Commission Regulation 37.3(b)(1)(iii), iSwap Euro hereby further requests from the Commission a unique, extensible, alphanumeric code for the purpose of identifying iSwap Euro in accordance with Part 45 of the Commission Regulations.

As noted above, pursuant to Commission Regulations 37.3(b)(2) and 145.9, iSwap Euro is separately filing a request for confidential treatment relating to certain information of the Application that are not required by Commission Regulation 40.8(a) to be made publicly available.

Please direct any questions in relation to this Application to Stephen M. Humenik, K&L Gates, LLP at +1-202-778-9477 or stephen.humenik@klgates.com, or the undersigned at the contact details as mentioned above.

Very truly yours,

Kieron Nolan

Chief Executive Officer

iSwap Euro B.V.

cc: Nancy Markowitz, Deputy Director, Market Review Branch, Division of Market Oversight