

RTX Fintech & Research LLC

128 East 31st Street, 2nd Floor
New York, NY 10016

April 27, 2022

By Email

Secretary of the Commission
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581
secretary@cftc.gov

Re: Updated Request for Full Registration as a Swap Execution Facility

Dear Secretary Kirkpatrick:

On March 16, 2022, RTX Fintech & Research LLC (“RTX SEF”) submitted a Swap Execution Facility (“SEF”) application in accordance with Section 5h of the Commodity Exchange Act and Part 37 of the regulations promulgated by the Commodity Futures Trading Commission (“CFTC” or “Commission”).

Since then, CFTC staff have asked that RTX SEF amend certain items in its application. RTX SEF submitted a first amendment to its SEF application on March 25, 2022 that addressed part of the CFTC staff’s request. RTX SEF addressed the remainder of the CFTC staff’s request in a second amendment, which it submitted on April 21, 2022.

Yesterday CFTC staff has asked that RTX SEF update its transmittal letter with the current set of confidential exhibits. To satisfy this request, RTX SEF hereby submits this updated request for full registration as a SEF.

RTX SEF respectfully requests that the CFTC grant RTX SEF’s application for full registration pursuant to Commission regulation 37.3(b). Pursuant to Commission regulation 37.3(b)(1)(iii), RTX SEF requests from the Commission a unique, extensible, alphanumeric code for the purpose of identifying the SEF pursuant to Part 45 of the Commission’s regulations.

RTX SEF has submitted to the Assistant Secretary of the Commission for Freedom of Information a request for confidential treatment of the documents listed on Appendix A hereto (the “Confidential Information”). RTX SEF has provided a copy of the request for your information. The basis for this petition for confidential treatment is CFTC Regulation Section 145.9(d)(1)(ii), in that the Confidential Information contains trade secrets and confidential commercial and/or financial information. RTX SEF requests this confidential treatment for an indefinite period.

If you have any questions regarding this application, please contact RTX SEF's Chief Compliance Officer Patrick McCarty at (201) 577-4702.

Sincerely,

A handwritten signature in black ink, appearing to read "D Nelson". The letters are stylized and connected.

David Nelson
Vice President

Cc by email:

Division of Market Oversight, Commodity Futures
Trading Commission (dmosubmissions@cftc.gov)

Nancy Markowitz, Division of Market Oversight, Commodity Futures
Trading Commission (nmarkowitz@cftc.gov)

Jonathan Lave, Division of Market Oversight, Commodity Futures
Trading Commission (jlave@cftc.gov)

Matt Jones, Division of Market Oversight, Commodity Futures
Trading Commission (Majones@cftc.gov)

Confidential Information

Name of Confidential Information		Description	Identifying Number and Code
A		List of control persons of RTX Fintech & Research LLC (“RTX SEF”)	RTX SEF Exhibit A
B		List of officers and directors of RTX SEF	RTX SEF Exhibit B
D		RTX SEF organizational chart, addresses for legal service of process	RTX SEF Exhibit D
E		Qualifications of RTX SEF’s professional employees	RTX SEF Exhibit E
F		Staffing requirements of RTX SEF; name and qualifications of each key staff person	RTX SEF Exhibit F
H		List of material pending legal proceedings	RTX SEF Exhibit H
I		Statement of financial condition of RTX SEF, operating costs, financial resources, and sources of operational resources of RTX SEF	RTX SEF Exhibit I
J		Financial information of certain RTX SEF affiliates	RTX SEF Exhibit J
K		RTX SEF fee schedule	RTX SEF Exhibit K
N		Service agreements	RTX SEF Exhibit N
	N-1	Exhibit N-1	RTX SEF Exhibit N, N-1
	N-2	Exhibit N-2	RTX SEF Exhibit N, N-2
	N-3	Exhibit N-3	RTX SEF Exhibit N, N-3
	N-4	Exhibit N-4	RTX SEF Exhibit N, N-4
	N-5	Exhibit N-5	RTX SEF Exhibit N, N-5
	N-6	Exhibit N-6	RTX SEF Exhibit N, N-6
	N-7	Exhibit N-7	RTX SEF Exhibit N, N-7
	N-8	Exhibit N-8	RTX SEF Exhibit N, N-8
	N-9	Exhibit N-9	RTX SEF Exhibit N, N-9
	N-10	Exhibit N-10	RTX SEF Exhibit N, N-10
	N-11	Exhibit N-11	RTX SEF Exhibit N, N-11
	N-12	Exhibit N-12	RTX SEF Exhibit N, N-12
	N-13	Exhibit N-13	RTX SEF Exhibit N, N-13
	N-14	Exhibit N-14	RTX SEF Exhibit N, N-14
O		RTX SEF compliance manual	RTX SEF Exhibit O
P		RTX SEF disciplinary and enforcement procedures; alternative dispute resolution	RTX SEF Exhibit P
Q		Explanation of RTX SEF’s trading systems and platforms	RTX SEF Exhibit Q
S		Discussion of how RTX SEF’s trading data will be maintained	RTX SEF Exhibit S
V		RTX SEF’s responses to the technology questionnaire	RTX SEF Exhibit V
	Appendix	Appendix to Exhibit V with technology risk documentation	RTX SEF Exhibit V, Appendix
V		RTX SEF’s amended responses to the technology questionnaire	RTX SEF Exhibit V
	Appendix	Amended Appendix to Exhibit V with responsive technology risk documentation	RTX SEF Exhibit V, Appendix