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February 12, 2021

**SUBMITTED VIA PORTAL**

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

Re: Submission 21-01: Refinitiv US SEF LLC – Amendments to Rulebook

Ladies and Gentlemen:

Pursuant to Commodity Futures Trading Commission (the “Commission”) Regulation 40.6(a), Refinitiv US SEF LLC (“RSEF”) hereby self-certifies the amendments to its Rulebook identified in Exhibit A. The Rulebook has been amended in order to reflect certain new requirements related to error trades under Commission Regulation 37.9(e). The amended Rulebook will become effective on March 2, 2021.

A concise explanation and analysis of the amendments to the Rulebook and their compliance with applicable provisions of the Commodity Exchange Act (the “CEA”) is attached hereto as Exhibit A, and the amendments showing changes against the version submitted to the Commission in Submission 20-03-A on November 20, 2020, is attached hereto as Exhibit B.

RSEF hereby certifies that: (i) the amended Rulebook complies with the CEA and the Commission’s regulations thereunder, and (ii) a notice and copy of this submission is being concurrently posted on RSEF’s website. No substantive opposing views were expressed with respect to the amendments to the Rulebook.

Please contact me using the information below if you have any questions regarding these amendments to the Rulebook.

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Sincerely,

*Michael W. Rooney*

Michael W. Rooney  
Chief Compliance Officer

cc: Nancy Markowitz, Deputy Director, Division of Market Oversight, Exchange and Data  
Repository Branch

Jasmine Lee, Special Counsel, Division of Market Oversight  
(Commodity Futures Trading Commission)

**EXHIBIT A**  
**Explanation and Analysis of Material Amendments**

**Summary:** The Rulebook has been amended in order to reflect certain new requirements related to post-trade name give-up under Commission Regulation 37.9(e). The amended Rulebook showing changes against the version submitted to the Commission in Submission 20-03-A on November 20, 2020, is attached hereto as Exhibit B.

Capitalized terms used but not otherwise defined herein have the meanings assigned to them in the Rulebook.

| <b>Amendment and Explanation</b>  | <b>Relevant Law, Regulation or Guidance</b> |
|---|---|
| <p><u>Rule 513(a)</u></p> <p>Added new subsection (1) to clarify the procedure for correcting Error Trades by executing a Correcting Trade (for Transactions that were rejected from clearing) or an offsetting trade (for Transactions that were accepted for clearing).</p> | <p>Core Principle 2</p>                     |
| <p><u>Rule 707(a)</u></p> <p>Revise reference to former CFTC Regulation 37.9(d) to refer instead to new CFTC Regulation 37.9(f).</p>  | <p>Core Principle 2</p>                     |

**EXHIBIT B**  
**Rulebook Amendments**