

February 24, 2023

Submitted via Portal

Mr. Christopher J. Kirkpatrick Office of the Secretariat U.S. Commodity Futures Trading Commission Three Lafayette Centre 1155 21st Street, N.W. Washington, D.C. 20581

### Re: CFTC Regulation 40.6(a) Required Certification AEGIS SEF, LLC Amendment to Rulebook (Fee Schedule)

Dear Sir:

Pursuant to Section 40.6(a) of the regulations of the U.S. Commodity Futures Trading Commission (the "CFTC", or the "Commission"), AEGIS SEF, LLC ("AEGIS") hereby notifies the Commission that it has amended its Fee Schedule to establish fees for Broker Firms that utilize Offline Execution Functionality and post transactions to AEGIS SEF for execution using an Application Programming Interface ("API"). The Rule Amendments shall become effective 10 days after this submission has been filed or immediately upon approval by the CFTC, whichever occurs first.

A concise explanation and analysis of the rules and their compliance with applicable provisions of the Act, including core principles and the Commission's regulations, is attached hereto as Exhibit A. A copy of the Fee Schedule is attached under separate cover as Exhibit B. A redlined version of the Fee Schedule is attached under separate cover as Exhibit C.

AEGIS hereby certifies that: (i) the amended rule complies with the Act and the Commission's regulations thereunder, and (ii) a notice and copy of this submission is being concurrently posted on AEGIS's website. There were no substantive opposing views to the amendments to the rule.

Please contact the undersigned at 832-413-5973 or afurman@aegis-hedging.com with any questions regarding this matter.

# **AEGIS SEF**

Andrew Furman

Andrew Furman Chief Compliance Officer AEGIS SEF, LLC 2829 Technology Forest Blvd Suite 260 The Woodlands, TX 77381

### Exhibit A – Explanation

Amendment and Explanation	Supporting Rule / Core Principle
<ul> <li>Updated Fee Schedule</li> <li>Added fee category for Broker Firms that utilize Offline Execution Functionality and post transactions to AEGIS SEF for execution using an API</li> </ul>	<ul> <li>Core Principle 1(B)- Reasonable Discretion of swap execution facility</li> <li>§ 37.202 – Impartial Access</li> </ul>

## **AEGIS SEF**

### Exhibit B – AEGIS SEF Fee Schedule - clean

(attached under separate cover)

### Exhibit C – AEGIS SEF Fee Schedule - redline

(attached under separate cover)