



Tradition SEF, Inc.

Scot J. Halvorsen
General Counsel and Secretary
Legal Department

March 8, 2019

VIA ELECTRONIC PORTAL

Commodity Futures Trading Commission
CFTC FOIA Compliance Office
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

**Re: Tradition SEF, Inc. FOIA Confidential Treatment Request.
CFTC Regulation 40.6(a) Rule Certification.
Tradition SEF Submission No. 2019-01.**

Dear Secretary:

By electronic portal today, March 8, 2019, Tradition SEF, Inc. (the "Submitter"), pursuant to Part 40 of the Commodity Futures Trading Commission's (the "Commission") regulations, voluntarily provided its Trad-X Interest Rate Swap (IRS) trading platform supplement (the "Platform Supplement") attached to Submission No. 2019-01 as Exhibit B (the "Confidential Information") to the Secretary of the Commission and staff of the Division of Market Oversight in connection with a Swap Execution Facility ("SEF") rule submission made pursuant to Commission Rule 40.6(a).

Pursuant to Commission Rules 40.8 and 145.9(d), the Submitter requests confidential treatment of certain Confidential Information contained on the Platform Supplement attached to Submission No. 2019-01 as Exhibit B on the grounds that disclosure of such Confidential Information would reveal confidential commercial information of the Submitter. The provisions of the Platform Supplement that confidential treatment is requested are clearly highlighted in yellow on Exhibit B. The redacted version of the Platform Supplement will be publicly available on Tradition SEF's website. The provisions for which confidential treatment is requested describe the Trad-X Credit Matrix functionality, Spread Over Stack priority rule characteristics, USD Interest Rate Swaps order sizes, minimum order size applied to USD Spread Over orders, and GBP Interest Rate Swaps order sizes. Such information is proprietary to Submitter's platform and represents commercial methodologies that provide value and differentiate the Submitter from its competitors.

Pursuant to Commission Rule 145.9(d)(5) the Submitter requests that confidential treatment of the Confidential Information be maintained until further notice from the Submitter. The Submitter requests that the Commission notify it immediately after receiving any request under the Freedom of Information Act ("FOIA") or any other court order, subpoena or summons for the Confidential Information. The Submitter specifically notes that it does not waive in any manner its rights under Section 8(f) of the Commodity Exchange Act to receive a copy of any subpoena or summons for the Confidential Information prior to the Commission's disclosure of such information pursuant to such subpoena or summons. Finally, the Submitter requests that the Commission notify it in the event that the Commission intends to disclose the Confidential Information to Congress or any federal or state governmental agency or department.

Should you require additional information related to this submission, please contact the undersigned at (212) 377-2337 or scot.halvorsen@tradition.com. Please reference Tradition SEF Submission No. 2019-01 in any related correspondence.

Sincerely,

/s/ Scot J. Halvorsen
General Counsel and Secretary