



Tradition SEF, Inc.

Scot J. Halvorsen
General Counsel and Secretary
Legal Department

March 18, 2019

VIA ELECTRONIC PORTAL

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

**Re: CFTC Regulation 40.6(a) Rule Certification.
Amendments to the Tradition SEF, Inc. Rulebook and Trad-X Interest Rate Swap (IRS)
Platform Supplement.
Tradition SEF Submission No. 2019-01 (CONFIDENTIAL TREATMENT REQUESTED).**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c) of the Commodity Exchange Act, as amended (the “Act”), and Commodity Futures Trading Commission (“CFTC” or the “Commission”) Regulation 40.6(a), Tradition SEF, Inc. (“Tradition SEF”) hereby notifies the Commission that it is amending the Tradition SEF Rulebook (the “Rulebook”) and the Trad-X Interest Rate Swap (IRS) Trading Platform Supplement (the “Platform Supplement”), effective as of April 2, 2019. Tradition SEF has simultaneously submitted a request for confidential treatment for certain provisions of the Platform Supplement that are highlighted in yellow on the attached redline version of the Platform Supplement filed with the Commission.

Tradition SEF amended the Rulebook and Platform Supplement to add a Request for Continuous Stream (RFCS) functionality. The RFCS process is defined and detailed in the attached Rulebook and Platform Supplement. Pursuant to Commission Regulation 40.8, Tradition SEF hereby makes the Rulebook and Platform Supplement attached hereto as Exhibits A and B respectively, publicly available.

Tradition SEF continues to be in compliance with applicable provisions of the Act, including the Core Principles. Tradition SEF hereby certifies that the rule amendments comply with the Commodity Exchange Act and the Commission’s regulations thereunder. No substantive opposing views were expressed that were not incorporated into the rule amendments. Tradition SEF hereby certifies that it has posted a notice of pending certification with the Commission and a copy of the submission on its website (see <http://www.traditionsef.com/regulatory/>), concurrent with the filing of this submission with the Commission.

Should you require additional information related to this submission, please contact the undersigned at (212) 337-2337 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

Attachments: Exhibits A and B

Exhibit A
Tradition SEF Rulebook

Exhibit B

Tradition SEF Trad-X Interest Rate Swap (IRS) Trading Platform Supplement