



TRADITION SEF, Inc.

Scot J. Halvorsen  
Senior Regulatory Counsel and Secretary  
Legal Department

March 29, 2018

**VIA E-MAIL (submissions@cftc.gov)**

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.  
Notification of Amendments to Tradition SEF, Inc. Rulebook and  
StreamGlobal Credit Default Swap Trading Platform Supplement.  
Tradition SEF Submission No. 2018-01.**

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 of amendments to the Tradition SEF Rulebook (the "Rulebook") and the StreamGlobal Credit Default Swap Trading Platform Supplement to the Rulebook (the "Platform Supplement"), to be effective and implemented by Tradition SEF as of April 16, 2018. Attached as Exhibit B are redlined versions of the Rulebook and Platform Supplement reflecting the amendments described herein.

We have identified on Exhibit A amendments to Rule 541 of the Rulebook and Rule S3-104 of the Platform Supplement and compliance with the SEF core principles (the "Core Principles") as set forth in Section 5h of the Act and Part 37 of the Commission's regulations promulgated thereunder.

Tradition SEF continues to comply with the Core Principles. In particular, Tradition SEF has determined that it is in compliance with Core Principle 1 (Compliance with Core Principles) and Core Principle 2 (Compliance with Rules), as further described in the compliance table provided in Exhibit A. Tradition SEF hereby certifies that the rule amendments comply with the Act and the Commission's regulations promulgated 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) 377-2337 or [scot.halvorsen@tradition.com](mailto:scot.halvorsen@tradition.com). Please reference Tradition SEF Submission No. 2018-01 in any related correspondence.

Sincerely,



Scot J. Halvorsen  
Senior Regulatory Counsel and Secretary

Attachments: Exhibit A – Compliance with Core Principles table  
Exhibit B – Tradition SEF Rulebook and Platform Supplement (redline format)

**EXHIBIT A**  
**Compliance with Core Principles**

<b>Rules</b>	<b>Rule Change</b>	<b>Explanation and Analysis of the operation, purpose, and effect of the proposed rule or rule amendment and its compliance with applicable provisions of the Act, including core principles, and the Commission’s regulations thereunder.</b>
<b>Tradition SEF Rule 541</b>	Tradition SEF amended Rule 541 to provide consistency among Platforms regarding post-trade name give-up for MAT Transactions.	The purpose of this Rule amendment is to provide Participants and Customers certainty when a party to a transaction executed on or through Tradition SEF will be provided with the other party’s relevant information. By stipulating when counterparty identification exchanges must occur, Tradition SEF continues to comply with Core Principles 2 (Compliance with rules) and 4 (Monitoring of trading and trade processing) and CFTC Regulation 37.200(c), which requires a SEF to “[e]stablish rules governing the operation of the facility, including rules specifying trading procedures to be used in entering and executing orders traded or posted on the facility, including block trades.”
<b>Platform Supplement Rule S3-104</b>	Tradition SEF amended Platform Supplement Rule S3-104 to provide consistency among Platforms regarding post-trade name give-up for MAT Transactions.	The purpose of this Rule amendment is to provide Participants and Customers certainty when a party to a transaction executed on or through Tradition SEF will be provided with the other party’s relevant information. By stipulating when counterparty identification exchanges must occur, Tradition SEF continues to comply with Core Principles 2 (Compliance with rules) and 4 (Monitoring of trading and trade processing) and CFTC Regulation 37.200(c), which requires a SEF to “[e]stablish rules governing the operation of the facility, including rules specifying trading procedures to be used in entering and executing orders traded or posted on the facility, including block trades.”

**EXHIBIT B**

**Redlined Rulebook**

**Redlined StreamGlobal Credit Default Swap Trading Platform Supplement**

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