



March 31, 2017

BY ELECTRONIC SUBMISSION

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

Re: SwapEx CFTC Submission 01-17: Certification Pursuant to Commission Rule 40.6 – Rule Amendments

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c) of the Commodity Exchange Act (the “Act”) and Section 40.6(a) of the regulations of the Commodity Futures Trading Commission (the “CFTC” or “Commission”), SwapEx, LLC (“SwapEx”, or the “Company”) hereby notifies the Commission that it has amended its Rulebook and that it is certifying those amendments. The Rulebook has been amended in response to the Commission’s issuance of CFTC No-Action Letter 17-17. The amended Rulebook will become effective on April 17, 2017.

A concise explanation of the amendment to the Rulebook and their compliance with applicable provisions of the Act, including core principles and the Commission’s regulations, is attached hereto as Exhibit A. A clean copy of the amended Rule is attached hereto as Exhibit B, and a copy of the Rule marked to show changes against the version submitted to the Commission as part of the Rule certification on September 15, 2016, is attached hereto as Exhibit C. SwapEx hereby certifies that: (i) the amended Rulebook complies with the Act and the Commission’s regulations thereunder, and (ii) a notice and copy of this submission is being concurrently posted on SwapEx’s web site. There were no substantive opposing views to the amendments to the Rulebook.

In the event that you have questions, please contact the undersigned at (312)798-6517 or BJRegan@statestreet.com.

Sincerely,

A handwritten signature in blue ink that reads "Brian J. Regan".

Brian J. Regan
Chief Compliance Officer

Encl. (Exhibits A, B and C)