

April 9, 2020

Submitted via CFTC Portal

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

Re: TW SEF LLC – Amendment to Rule 1005(c) (New Swap/Old Terms following a DCO Rejected Swap) and Rule 1005(d) (New Swap/Old Terms and New Swap/Corrected Terms following a Cleared Error Swap)

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 “Commission”), Tradeweb SEF LLC (“TW SEF”) hereby submits amendments to its Rulebook related to the above-captioned Rules. The Rulebook has been amended to reflect updates to Rule 1005(c) and 1005(d) in order to implement certain requirements with respect to error trades related to CFTC No-Action Letter 20-01, *Supplemental No-Action Relief for Swap Execution Facilities and Designated Contract Markets in Connection with Swaps with Operational or Clerical Errors Executed on a Swap Execution Facility or Designated Contract Market* (Jan. 8, 2020). The amendments will become effective on April 23, 2020, no fewer than ten business days from the date hereof. In connection with this submission, TW SEF hereby notifies the Commission that:

1. TW SEF certifies that it has posted a notice of this pending certification with the Commission and a copy of this submission on TW SEF’s website, including a redline of the changes to Rules 1005(c) and 1005(d), which is attached here to as Attachment A;
2. TW SEF certifies that the Rules comply with the Act and the Commission’s regulations thereunder; and
3. No substantive opposing views with respect to the Rules were expressed to TW SEF by its governing board or committee members, members of TW SEF or market participants.

Should you have questions regarding this submission, please contact the undersigned at (646) 560-7223 or at Gregory.compa@tradeweb.com.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Gregory Compa". The signature is stylized and cursive.

Gregory Compa
Chief Compliance Officer

cc: Dorothy D. DeWitt, Division of Market Oversight

ATTACHMENT A

Redline Version of Amendments to Rule 1005