



April 10, 2015

Submitted via CFTC Portal
Office of the Secretariat
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street
Washington, DC 20581

Re: Submission of Javelin SEF, LLC Rule Amendment (Submission No. 15-03)

To Whom It May Concern:

Pursuant to Section 5c(c) of the Commodity Exchange Act (“CEA”) and Section 40.6(a) of the regulations of the Commodity Futures Trading Commission (the “Commission”) Javelin SEF, LLC (“Javelin SEF”) hereby submits to the Commission rule amendments to its Rulebook.

Specifically, Javelin SEF has amended Rule 514 and a definition (“Rule Amendments”). The Rule Amendments will be effective April 24, 2015.

A concise explanation and analysis of the Rule Amendments is attached as Exhibit A. A marked copy of the Rule Amendments, which indicates the revisions with additions underscored and deletions overstruck as indicated, is attached as Exhibit B. A clean copy of the Rule Amendments is attached as Exhibit C.

Javelin SEF certifies that these rule amendments comply with the CEA and the Commission’s Regulations. Javelin SEF further certifies that this Submission has been concurrently posted on Javelin SEF’s website at <http://www.theJavelin.com>. No substantive opposing views were expressed with respect to Rule Amendments.

If you have any questions regarding this submission, please contact me at (646) 307-5931 or suellen.galish@thejavelin.com.

Sincerely,

/s/Suellen Galish
Senior Managing Director
General Counsel and
Chief Compliance Officer

Attachments

cc: Mark Schlegel, Division of Market Oversight, Commodity Futures Trading Commission
(Email: MSchlegel@CFTC.gov)

Exhibit A

Explanation and Analysis of Javelin SEF Rule Changes

The following is a concise explanation and analysis of the proposed rule amendments which includes the core principles and Commission regulations thereunder.

Rule	Explanation of Amendment(s)	Applicable Core Principle and Commission Regulation
Chapter 1 Defined Terms – Amended Definition of “Sponsored Person”	Amendments made to conform the definition of Sponsored Person with prior amendments made to the definition of “Sponsored Access”	Core Principle 2 Regulation 37.200 Regulation 37.201
Rule 514	Amendments made to provide flexibility with respect to the types of records a principal must maintain to document their authority to trade on behalf of a customer.	Core Principle 2 Regulation 37.200 Regulation 37.201

EXHIBIT B

Marked Copy of Rule Amendments

“Sponsored Person” shall mean an ECP, other than an individual or an ISV, which has been provided ~~electronic~~ access to Javelin SEF by the means of a Sponsoring Participant pursuant to Javelin SEF Rules, and shall be subject to the jurisdiction of Javelin SEF and comply with Javelin SEF Rules as if such Sponsored Person was a Participant. Except as provided in Javelin SEF Rule 323, for the avoidance of doubt, all references to Participant includes Sponsored Persons and their Authorized Traders.

Rule 514. Agency Trading

An Agent may enter orders, initiate RFQ inquiries or trade on Javelin SEF on behalf of a Principal pursuant to this Rule 514 and subject to applicable law.

1. ~~Written~~ Authorization. Each Agent shall have the prior ~~written~~ authorization to act on behalf of a Principal and keep a record of such authorization. In addition, it is the Agent’s responsibility to confirm that the person providing trading instruction on behalf of a Principal is authorized to do so.
2. Choice of Trading Method. Each Agent shall give the Principal the choice to trade in either the CLOB or the RFQ.

EXHIBIT C

Rule Amendments

“Sponsored Person” shall mean an ECP, other than an individual or an ISV, which has been provided access to Javelin SEF by the means of a Sponsoring Participant pursuant to Javelin SEF Rules, and shall be subject to the jurisdiction of Javelin SEF and comply with Javelin SEF Rules as if such Sponsored Person was a Participant. Except as provided in Javelin SEF Rule 323, for the avoidance of doubt, all references to Participant includes Sponsored Persons and their Authorized Traders.

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