

May 21, 2020

Submitted via CFTC Portal

Division of Market Oversight
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: NEX SEF Limited – Regulation 40.6 Rule Certification – Amended Rulebook

Ladies and Gentlemen:

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”), NEX SEF Limited (“NEX SEF”) hereby notifies the Commission that it has amended its Rulebook, specifically Chapter 9 and Annex 1.

A concise explanation and analysis of the amendment to the Rulebook and its compliance with applicable provisions of the Act and the Commission’s regulations thereunder is attached hereto as Exhibit A.

A clean copy of the amended Rulebook is attached hereto as Exhibit B and a copy of the Rulebook marked to show changes against the version most recently submitted to the Commission is attached hereto as Exhibit C.

The amendment will become effective on June 8, 2020. NEX SEF certifies that the amendment complies with the requirements of the Act and the rules and regulations promulgated thereunder. NEX SEF has reviewed the swap execution facility core principles (“Core Principles”) as set forth in the Act and has determined that the amendment impacts the Core Principles identified in Exhibit A.

NEX SEF is not aware of any substantive opposing views expressed with respect to this filing and certifies that, concurrent with this filing, a copy of this submission was posted on the NEX SEF website and may be accessed at: <http://www.nexsef.com>.

Please contact the undersigned at (212) 521-4609 with any questions regarding this matter.

Very truly yours,



Nirup Ramalingam, Chief Operating Officer
NEX SEF LIMITED
London Fruit and Wool Exchange
1 Duval Square
London E1 6PW
United Kingdom

Exhibit A*Explanation and Analysis*

NEX SEF has amended its Rulebook as provided below. Capitalized terms used but not defined herein have the meanings assigned to them in the Rulebook.

Section/Rule	Description of Revision	Reason and/or Supporting Rule or Core Principle
Chapter 9; Rule 901	Rule 901 was amended to add Aggress Full Size Only (AFSO) as an advanced Order type and to add corresponding language describing AFSO Orders and the matching process.	Conforming Change; Core Principle 2
Annex 1	Annex 1 was revised to reflect the most current ISDA Reporting Party Rules, including the ISDA OTC Derivatives Products Taxonomies.	Conforming Change; Core Principle 4; Core Principle 7; Commission Regulations 37.401, 37.404 and 37.700