

June 3, 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 – Rule Changes

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”), TW SEF LLC (“TW SEF”) hereby submits amendments to its Fully Integrated API Services Fee Schedule (All Credit Default Swap Indices), which has been amended to reflect updates to certain terms and fees. The amendment will become effective on June 17, 2020, no fewer than ten business days from the date hereof. Pursuant to Commission Regulations 40.8 and 145.9(d), attached as Appendix A are the updates to the API Services Fee Schedule for All Credit Default Swap Indices with the additions and deletions indicated in redline format. In connection with this submission, TW SEF hereby notifies the Commission that:

1. Pursuant to CFTC Regulations 40.8 and 145.9, TW SEF is seeking to keep certain information confidential because it would otherwise reveal trade secrets or confidential commercial or financial information and has posted a notice of pending certification with the Commission and a redacted copy of this submission on TW SEF’s website.
2. TW SEF certifies that the Rules comply with the Act and the Commission’s regulations thereunder, including Core Principle 2 (Compliance with rules), as the Fee Schedule is a rule of the SEF; 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,



Gregory Compa
Chief Compliance Officer

APPENDIX A

Fully Integrated API Services Fee Schedule (All Credit Default Swap Indices)

(Blackline and Clean Copies)

[REDACTED]

APPENDIX A

Fully Integrated API Services Fee Schedule (All Credit Default Swap Indices)

(Blackline and Clean Versions)