

July 17, 2019

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” or the “Facility”) hereby notifies the Commission that it has amended its Rulebook, specifically Rules 104, 201, 202, 204, 215, 310, 313, 315 and 517.

A concise explanation and analysis of the amendments to the Rulebook and their 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 amendments will become effective on August 1, 2019. NEX SEF certifies that the amendments comply 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 amendments impact 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. Additionally, NEX SEF has made certain non-substantive changes related to typographical errors and formatting throughout the Rulebook. 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
Cover Page	<ul style="list-style-type: none">• Updated effective date	<ul style="list-style-type: none">• Conforming change
Table of Contents	<ul style="list-style-type: none">• Updated page numbers	<ul style="list-style-type: none">• Conforming change
Definitions	<ul style="list-style-type: none">• Addition of definitions used in Rule 517• Addition of definition of eligible contract participant (“ECP”) and use of defined term throughout the Rulebook• Removal of definitions not used in Rulebook	<ul style="list-style-type: none">• Conforming change• Clarifying changes
Rule 104	<ul style="list-style-type: none">• Rule 104 has been amended to clarify that an Emergency includes circumstances that significantly (as opposed to materially) affect the performance of Contracts.	<ul style="list-style-type: none">• Core Principle 2• Clarifying change
Rule 201(f)	<ul style="list-style-type: none">• Rule 201(f) has been amended to require Trading Privilege Holders to periodically verify their Customers’ ECP status.	<ul style="list-style-type: none">• Core Principle 2• Core Principle 7
Rule 202(a)	<ul style="list-style-type: none">• Rule 202(a) has been amended to require each Trading Privilege Holder to submit an annual written representation that each of its Authorized Trading Firms continues to qualify as an ECP.	<ul style="list-style-type: none">• Core Principle 2• Core Principle 7
Rule 204(i)	<ul style="list-style-type: none">• Rule 204(i) has been amended to provide the Compliance Function more flexibility in determining when and how often to review Affirmations by Participants and Customers by permitting the Compliance Function to review such Affirmations on a periodic (as opposed to monthly) basis.	<ul style="list-style-type: none">• Core Principle 7
Rule 215(b)	<ul style="list-style-type: none">• Rule 215(b) has been amended to require Prime Brokers to cooperate with the Facility in investigations of Trading Privilege Holders for which the Prime Broker has provided a Prime Broker Representation.	<ul style="list-style-type: none">• Core Principle 2• Core Principle 7
Rule 310(b)	<ul style="list-style-type: none">• Rule 310(b) has been amended to include a cross-reference to Rule 315 with respect to cancellations of executed transactions.	<ul style="list-style-type: none">• Core Principle 2

Section/Rule	Description of Revision	Reason and/or Supporting Rule or Core Principle
Rule 313	<ul style="list-style-type: none"> • Rule 313 has been amended to include a cross-reference to Rule 315 with respect to cancellations of executed Intermediated Transactions. 	<ul style="list-style-type: none"> • Core Principle 2
Rule 315	<ul style="list-style-type: none"> • Rule 315(b) has been amended to clarify that Participants may mutually decide to amend or cancel transactions away from the Facility post execution. • Rule 315 has been amended to add new paragraph (k) governing cancellations of Intermediated Transactions due to operational or clerical errors other than those Errors governed by Rule 315 (h) and (i). 	<ul style="list-style-type: none"> • Core Principle 2
Rule 517	<ul style="list-style-type: none"> • Rule 517 has been added to apply CME Group policies regarding (i) the effect any suspension of Trading Privileges has on a Participant's privileges on other CME Group trading floors, exchanges, clearing organizations or swap execution facilities, and (ii) how a loss of trading privileges by a Participant on a CME Group exchange affects the Participant's Trading Privileges on NEX SEF. 	<ul style="list-style-type: none"> • Core Principle 2