



TRADITION SEF, Inc.

July 18, 2014

VIA E-MAIL (submissions@cftc.gov)

Ms. Melissa Jurgens
Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

RE: CFTC Regulation 40.6(a) Certification. Notification of Amendments to Tradition SEF, Inc. Rulebook and Platform Supplement. Tradition SEF Submission No. 14-19 (CONFIDENTIAL TREATMENT REQUESTED).

Dear Ms. Jurgens:

Pursuant to Section 5c(c) of the Commodity Exchange Act, as amended (the "Act"), and Commodity Futures Trading Commission ("CFTC" or the "Commission") Regulation 40.6, Tradition SEF, Inc. ("Tradition SEF") hereby notifies the Commission of amendments to its Rulebook, to be effective and implemented by Tradition as of August 4, 2014, which is the business day after the tenth business day of the Commission's review period.

Tradition SEF has amended the Rules to reflect the addition of a new "Disregard Tape" Order type. Rules related to Participant criteria, including eligibility to transact in Package transactions, and Participant obligations to oversee employees and specific obligations over Customers that are authorized to trade on a Platform have been modified or added to the Rulebook. We have identified in Exhibit A the modified Rules and compliance with the SEF core principles ("Core Principles") as set forth in Section 5h of the Commodity Exchange Act and Part 37 of the Commission's regulations thereunder and in Exhibit B the provisions in the platform supplements that relate to Package transactions and Order types and Compliance with Core Principles. Attached as Exhibits C and D are the redlined platform supplements. Tradition SEF has simultaneously submitted a request for confidential treatment for Exhibits B and C. A copy of that request for confidential treatment is included with this submission. Exhibit E contains a redlined Rulebook.

Tradition SEF continues to be in compliance with applicable provisions of the Act, including the Core Principles. In particular, Tradition SEF has determined that it is in compliance with Core Principles 1 (Compliance with Core Principles), 2 (Compliance with Rules), 4 (Monitoring of Trading and Trade Processing), 5 (Ability to Obtain Information) and 7 (Financial Integrity of Transactions), as further described in the compliance chart provided in Exhibits A and B.



TRADITION SEF, Inc.

Tradition SEF hereby certifies that the rule amendments comply with the Commodity Exchange Act and the Commission's regulations thereunder. No substantive opposing views were expressed that were not incorporated into the rule amendments. Tradition SEF hereby certifies that it has posted a notice of pending certification with the Commission and a copy of the submission on its website (see, e.g., <http://www.traditionsef.com/news/>), concurrent with the filing of this submission with the Commission.

Should you require additional information related to this submission, please contact the undersigned at 212-791-3497 or eric.earnhardt@tradition-na.com. Please reference Tradition SEF Submission No. 14-19 in any related correspondence.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric M. Earnhardt", written in a cursive style.

Eric Earnhardt

Chief Compliance Officer

Exhibit A
Exhibit B (Confidential treatment requested)
Exhibit C (Confidential treatment requested)
Exhibit D (Confidential treatment requested)
Exhibit E