



TRADITION SEF, Inc.

Scot J. Halvorsen  
General Counsel and Secretary  
Legal Department

August 2, 2019

**VIA ELECTRONIC PORTAL**

Mr. Christopher Kirkpatrick  
Office of the Secretariat  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, D.C. 20581

**RE: CFTC Regulation 40.6(a) Rule Certification.  
Notification of Tradition SEF, Inc. Liquidity Provider Program.  
Tradition SEF Submission No. 2019-03.**

Dear Mr. Kirkpatrick:

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 that Pursuant to Tradition SEF Rule 536, Tradition SEF hereby provides notice of the implementation of a Trad-X USD IRS Liquidity Provider Program, (the "LPP"), as set forth in the LPP Program description contained on Participant Notice 19-04 attached hereto as Exhibit B. The effective date for the commencement of the LPP is August 16, 2019.

We have identified on Exhibit A the LPP's 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 promulgated thereunder. Tradition SEF has simultaneously submitted a request for confidential treatment for Exhibit B (Participant Notice 19-04).

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) and 2 (Compliance with Rules), as further described in the compliance chart attached as Exhibit A.

Tradition SEF hereby certifies that the LPP's terms comply with the Commodity Exchange Act and the Commission's regulations promulgated thereunder. No substantive opposing views were expressed that were not incorporated into the LPP. Tradition SEF hereby certifies that it has posted a notice of pending certification with the Commission and a redacted version of the submission on its website (*see* <http://www.traditionsef.com/regulatory/>), 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) 377-2337 or scot.halvorsen@tradition.com. Please reference Tradition SEF Submission No. 2019-03 in any related correspondence.

Sincerely,

/s/ Scot J. Halvorsen  
General Counsel and Secretary

Exhibit A  
Exhibit B (Confidential treatment requested)

**EXHIBIT A**  
**Liquidity Provider Program**

<b>Rule</b>	<b>Change</b>	<b>Explanation and Analysis of the operation, purpose, and effect of the proposed rule or rule amendment and its compliance with applicable provisions of the Act, including core principles, and the Commission’s regulations thereunder.</b>
Participant Notice 19-04	Implementation of a Trad-X USD IRS Liquidity Provider Program (the “LPP”).	<p>The Implementation of a Trad-X USD IRS LPP demonstrates Tradition SEF’s adherence to open access principles. Accordingly, Tradition is promoting a fair, transparent platform. The LPP complies with Core Principle 2 (Compliance with Rules) and specifically with CFTC Rule 37.202, which requires impartial access to the SEF and transparent criteria governing access that is applied in a fair and nondiscriminatory manner. CFTC Rule 37.202 also requires a SEF to require that an eligible contract participant (“ECP”) consent to its jurisdiction before the ECP can access the SEF. By complying with Core Principle 2, Tradition SEF demonstrates its compliance with Core Principle 1 (Compliance with Core Principles) and CFTC Regulation 37.100, which requires that a SEF comply with any requirement that the CFTC may impose by rule or regulation.</p>

**EXHIBIT B**  
**Liquidity Provider Program Description**  
**Participant Notice 19-04**

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**EXHIBIT B IS SUBJECT TO A REQUEST FOR CONFIDENTIAL TREATMENT**