

August 22, 2017

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 – New Fee Schedule for API Participants – CDS Indices

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”) hereby submits its New Fee Schedule for API Participants as a rule for self-certification with the Commission, attached as an Appendix A. In connection with its submission of the Rules, TW hereby notifies the Commission that:

1. TW certifies that it has posted a notice of pending certification with the Commission and a copy of this submission on TW’s website;
2. The Rules are intended to be implemented on October 16, 2017;
3. TW certifies that the Rules comply with the Commodity Exchange Act and the Commission’s Regulations thereunder;
4. The Rules, which establish TW’s certain fees for accessing TW, are consistent with the impartial access requirements of SEF Core Principle 2, providing comparable fee structures for eligible contract participants receiving comparable access to TW;
5. No substantive opposing views with respect to the Rules were expressed to TW by its governing board or committee members, members of TW or market participants; and
6. TW has requested confidential treatment for the material segregated in Appendix A and has provided an additional redacted version together with this submission.



1177 Avenue of Americas
New York, New York 10036

Should you have questions regarding this submission, please contact the undersigned at (646) 560-7223 or at Gregory.compa@tradeweb.com.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Gregory Compa".

Gregory Compa
Chief Compliance Officer

cc: Abigail Knauff, Division of Market Oversight