



Daniel E. Glatter  
General Counsel and Secretary

**TRADITION SEF, Inc.**

October 7, 2019

**VIA E-MAIL (submissions@cftc.gov)**

Mr. Christopher Kirkpatrick  
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. Fee Schedule.  
Tradition SEF Submission No. 2019-04**

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 of amendments to its Fee Schedule, as described below, to be effective for market participants on October 21<sup>st</sup>, 2019.

Tradition SEF has amended Section E (Transaction Fees) of its Fee Schedule to reflect a revised fee in the Rates service area for IRS (Futures Unchanged) transactions.

We have identified in Exhibit A the modified fees 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 promulgated thereunder. A redlined fee schedule is attached hereto as Exhibit B to reflect the changes to the last version of the fee schedule. Tradition SEF has simultaneously submitted a request for confidential treatment for Exhibit B.

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 rule amendments 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 fee schedule 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 <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 [daniel.glatte@tradition.com](mailto:daniel.glatte@tradition.com). Please reference Tradition SEF Submission No. 2019-04 in any related correspondence.

Sincerely,

/s/ Daniel E. Glatter  
General Counsel and Secretary

Exhibit A  
Exhibit B (Confidential treatment requested)

**EXHIBIT A**  
**Amendments to Fee Schedule**

<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>
<b>Fee Schedule</b>	The fee schedule has been amended to reflect revisions to the fees for Futures Unchanged IRS trades.	The changes to the fee schedule demonstrates Tradition SEF's adherence to open access principles. Accordingly, Tradition is promoting a fair, transparent platform. The changes to the fee schedule comply 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.

**EXHIBIT B**  
**Redlined Fee Schedule**

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