Refinitiv US SEF LLC 28 Liberty Street – 58th Floor New York, NY 10005 www.refinitiv.com



November 5, 2021

SUBMITTED VIA PORTAL

Commodity Futures Trading Commission Three Lafayette Centre 1155 21st Street, NW Washington, DC 20581

Re: <u>Submission 21-A: Refinitiv US SEF LLC – Notice to Participants</u>

Ladies and Gentlemen:

Pursuant to Commodity Futures Trading Commission (the "Commission") Regulation 40.6(a), Refinitiv US SEF LLC ("RSEF") hereby self-certifies the Notice to Participants attached as Exhibit B. The Notice to Participants clarifies that RSEF only facilitates the execution of swaps (including non-deliverable forwards) listed by RSEF that are not intended to be cleared, and that any decision to clear trades executed on RSEF is considered to be made post-trade and without Refinitiv SEF's involvement. The Notice to Participants will become effective on November 19, 2021.

A concise explanation and analysis of the Notice to Participants and its compliance with applicable provisions of the Commodity Exchange Act (the "CEA") is attached hereto as Exhibit A, and the Notice to Participants itself is attached hereto as Exhibit B.

RSEF hereby certifies that: (i) the Notice to Participants complies with the CEA and the Commission's regulations thereunder, and (ii) a notice and copy of this submission is being concurrently posted on RSEF's website. No substantive opposing views were expressed with respect to the Notice to Participants.

Please contact me using the information below if you have any questions regarding the Notice to Participants.

Michael W. Rooney 28 Liberty Street – 58th Floor New York, NY 10005 Phone: (646) 223-7397 Email: <u>Michael.w.rooney@refinitiv.com</u>

Sincerely,

Michael W. Rooney

Michael W. Rooney Chief Compliance Officer

cc: Nancy Markowitz, Deputy Director, Division of Market Oversight, Market Review Branch

Marilee Dahlman, Special Counsel, Division of Market Oversight (Commodity Futures Trading Commission)

EXHIBIT A Explanation and Analysis of Notice to Participants

Rule and Explanation	Relevant Law, Regulation or Guidance
Notice to Participants	Core Principle 7
Clarifies that RSEF only facilitates the execution of swaps (including non-deliverable forwards) listed by RSEF that are not intended to be cleared, and that any decision to clear trades executed on RSEF is considered to be made post-trade and without Refinitiv SEF's involvement.	

EXHIBIT B Notice to Participants