

Refinitiv US SEF LLC
3 Times Square – 20th Floor
New York, NY 10036
www.refinitiv.com



November 9, 2020

SUBMITTED VIA PORTAL

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

Re: FOIA Confidential Treatment: Petition Pursuant to 17 C.F.R. §§ 145.5 and 145.9

Re: Submission 20-03: Refinitiv US SEF LLC – Amendments to Rulebook

Ladies and Gentlemen:

Pursuant to Commodity Futures Trading Commission (the “Commission”) Regulation 40.6(a), Refinitiv US SEF LLC (“RSEF”) hereby self-certifies the amendments to its Rulebook identified in Exhibit A. The Rulebook has been amended in order to reflect certain new requirements related to counterparty anonymity under Commission Regulation 37.9(d). The amended Rulebook will become effective on November 24, 2020.

A concise explanation and analysis of the amendments to the Rulebook and their compliance with applicable provisions of the Commodity Exchange Act (the “CEA”) is attached hereto as Exhibit A, and the amendments showing changes against the version submitted to the Commission in Submission 19-01 on March 1, 2019, is attached hereto as Exhibit B.

RSEF hereby certifies that: (i) the amended Rulebook 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 amendments to the Rulebook.

Please contact me using the information below if you have any questions regarding these amendments to the Rulebook.

Michael W. Rooney
3 Times Square – 20th Floor
New York, NY 10036
Phone: (646) 223-7397
Email: Michael.w.rooney@refinitiv.com

Sincerely,

Michael W. Rooney

Michael W. Rooney
Chief Compliance Officer

cc: Nancy Markowitz, Deputy Director, Division of Market Oversight, Exchange and Data
Repository Branch

Jasmine Lee, Special Counsel, Division of Market Oversight
(Commodity Futures Trading Commission)

EXHIBIT A
Explanation and Analysis of Material Amendments

Summary: The Rulebook has been amended in order to reflect certain new requirements related to post-trade name give-up under Commission Regulation 37.9(d). The amended Rulebook showing changes against the version submitted to the Commission in Submission 19-01 on March 1, 2019, is attached hereto as Exhibit B.

Capitalized terms used but not otherwise defined herein have the meanings assigned to them in the Rulebook.

Amendment and Explanation	Relevant Law, Regulation or Guidance
<p><u>Rule 702</u></p> <p>Added a proviso stating that the identity of each Counterparty to a Permitted Transaction executed on the CLOB will only be disclosed if the transaction is not intended to be submitted for clearing contemporaneously with execution.</p>	<p>Core Principle 2</p>
<p><u>Rule 707</u></p> <p>Added new Rule 707 explaining the prohibition of post-trade name give-up for swaps executed anonymously and intended to be cleared.</p>	<p>Core Principle 2</p>

EXHIBIT B
Rulebook Amendments