



THOMSON REUTERS

Thomson Reuters (SEF) LLC  
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New York, NY 10036

December 1, 2017

**Submitted Via Portal**

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

Re: Submission 17-05: Thomson Reuters (SEF) LLC – Amendments to Rulebook

Ladies and Gentlemen:

Pursuant to Commodity Futures Trading Commission (the “Commission”) Regulation 40.6(a), Thomson Reuters (SEF) LLC (“TR SEF”) hereby self-certifies the amendments to its Rulebook identified in Exhibit A. The Rulebook has been amended in order to clarify certain points in TR SEF Chapters 3 and 5. The amended Rulebook will become effective on December 15, 2017.

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 17-04 on September 18, 2017, is attached hereto as Exhibit B.

TR SEF 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 TR SEF’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.

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Sincerely,



Wayne Pestone  
Chief Compliance Officer

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

Roger Smith, 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 clarify certain points in TR SEF Chapters 3 and 5. The amendments showing changes against the version submitted to the Commission in Submission 17-04 on September 18, 2017, is attached hereto as Exhibit B.

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

<b>Amendment and Explanation</b>	<b>Relevant Law, Regulation or Guidance</b>
<u>Chapter 1</u>  Amended definition of Intermediary Agreement, removing reference to SEF Rule 301(b)	Core Principle 2
<u>Rule 301</u>  Amended rule to require an Account Manager or a Sponsoring Participant to enter into a written agreement with Clients, Customers, and Sponsored Persons in accordance with Applicable Law and the SEF Rules and Obligations.	Core Principles 2 & 4
<u>Rule 501(b)</u>  Amended language to specify financial responsibility for Orders and Transactions.	Core Principle 2
<u>Rule 503</u>  Amended language to specify that the SEF may examine the books and records, systems, equipment and software of any Participant that relate to SEF Activity, while agreeing to adhere to the Participant’s reasonable physical access and security procedures.	Core Principles 2 & 5

**EXHIBIT B**  
**Rulebook Amendments**