



Daniel E. Glatter
General Counsel and Secretary

TRADITION SEF, Inc.

December 3, 2020

VIA CFTC Portal

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. Rulebook
Tradition SEF Submission No. 2020-06**

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 Notice 20-08 which informs Participants of amendments to its Rulebook to update references to no-action letters that have been recently extended and which are referenced in Rules 509, 703 and 707.

Although the Rulebook text has not been amended, the Notice clarifies that the references to expired relief in no-action letters 17-55, 17-60 and 17-27 are now intended to reference the more recently issued no action letters extending prior relief. It also advised that further changes will be made upon the issuance of an effective date of final rules that have been approved by the Commission and that address many of the substantive issues contained in the no action letters.

We have identified in Exhibit A the rule modifications 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 redline version of the Rulebook is attached hereto as Exhibit B to reflect the changes to the last version of the Rulebook.

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 Principle 1 (Compliance with Core Principles) 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 rule 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. Please reference Tradition SEF Submission No. 2020-06 in any related correspondence.

Sincerely,

/s/ Daniel E. Glatter
General Counsel and Secretary

Att.:
Exhibit A
Exhibit B

EXHIBIT A
Amendments to the Rulebook

Rule	Change	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.
509	References to no action letter 17-60 are to be construed as referencing no action letter 20-35	The changes to Rule 509 demonstrate 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.
703	References to no action letter 17-27 are to be construed as referencing no action letter 20-01.	The changes to Rule 703 demonstrate 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.
707	References to no action letter 17-55 are to be construed as referencing no action letter 20-31	The changes to Rule 707 demonstrate 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

Tradition SEF Notice to Participants 20-08



Tradition SEF, Inc.

Participant Notice 20-08

Modifications to References to No-Action Letters in Tradition SEF Rulebook

December 3, 2020

To : Tradition SEF Authorized Representatives

From : Tradition SEF Legal, Compliance, and Operations

Authorized Representatives,

Following recent actions, the Staff of the Commodity Futures Trading Commission (the “CFTC” and the “Staff”) extended various expiring no-action relief relating to package transactions, block trades and errors resulting from operational or clerical errors. This relief had been contained in no-action letters 17-55 (package transactions), 17-60 (block trades) and 17-27 (operational and clerical errors). Following the expiration of the relief in the no-action letters, the Staff extended them and they are now memorialized in letters 20-31 (package transactions), 20-35(block trades) and 20-01 (operations and clerical errors).

This Notice is intended to advise all Participants that references in the Tradition SEF Rulebook to the expired relief in Rule 707 (Package Transactions), Rule 509 (Block trades) and Rule 703 (Cleared Swaps, Rejections and Errors) shall now be construed as referencing the recently issued no-action letters. All Rulebook provisions regarding Tradition SEF’s compliance with the above-referenced No-Action letters remains the same. At this time, Tradition SEF will not be publishing a revised Rulebook.

Going forward, Tradition SEF will update its Rulebook at a later date to reflect Final Rules approved by the CFTC on September 17, 2020 and November 18, 2020 that amend the CFTC regulations by formally memorializing the no-action relief in these substantive areas. We anticipate this to occur following the CFTC’s publication of the effective date of these revisions.

A copy of this Notice has been filed with the CFTC. Thank you for your attention to this and please contact us at the contact information below with any questions.

For Tradition SEF legal matters, please contact:

Dan Glatter, General Counsel: (212) 377 2337 or daniel.glatter@tradition.com

For SEF compliance or administrative questions please contact:

Eric Earnhardt, CCO: (212) 791 3497 or eric.earnhardt@tradition.com

Jeff Mehan, CAO: (212) 943 4567 or jeff.mehan@tradition.com