

tpSEF Inc.

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December 23, 2019

Submitted via CFTC Portal

Mr. Christopher J. Kirkpatrick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: *tpSEF Inc. – Regulation 40.6(a) Rule Certification; Notification of Amendments to Exhibit Q to tpSEF Inc.’s Form SEF (tpSEF Submission #19-07R)*

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c) of the Commodity Exchange Act, as amended (the “Act”), and Section 40.6(a) of the regulations of the Commodity Futures Trading Commission (the “Commission”), tpSEF Inc. (“tpSEF”), a registered swap execution facility, hereby notifies the Commission that it wishes to amend Exhibit Q to its Form SEF as provided in Exhibit A. The intended date of implementation of the amended Exhibit Q is January 8, 2020.

Pursuant to Commission Regulation 40.6, this submission includes:

- (i) A concise explanation and analysis of the amended rules and their compliance with applicable provisions of the Act, attached as Exhibit A;
- (ii) A clean copy of the amended Exhibit Q, attached as Exhibit B; and
- (iii) A copy of the amended Exhibit Q marked to show changes to the currently effective version, attached as Exhibit C.

tpSEF hereby certifies that the amendments comply with the requirements of the Act and Commission regulations thereunder. tpSEF is not aware of any substantive opposing views expressed with respect to this filing and certifies that, concurrent with this filing, a copy of this submission was posted on tpSEF’s website.

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tpSEF is separately filing with the Assistant Secretary of the Commission for FOI, Privacy and Sunshine Acts Compliance, pursuant to Commission Regulation 145.9, a petition for confidential treatment of this submission (the "FOIA Confidential Treatment Request") on the grounds that disclosure would reveal confidential commercial and financial information. A copy of the FOIA Confidential Treatment Request is included with this submission.

Please contact Brian D. Donnelly, Chief Compliance Officer, at (201) 984-6956 or by email at bddonnelly@tullettprebon.com with any questions regarding this matter.

Very truly yours,

tpSEF Inc.

By: 

Name: Brian D. Donnelly

Title: Chief Compliance Officer

Date: December 23, 2019

Enclosures

cc: CFTC Division of Market Oversight (dmosubmissions@cftc.gov)
Nancy Markowitz, CFTC (nmarkowitz@cftc.gov)

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EXHIBIT A

Explanation of Amended Rules

[FOIA Confidential Treatment Requested]

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EXHIBIT B

Exhibit Q to tpSEF Inc.'s Form SEF

(Clean Version)

[FOIA Confidential Treatment Requested]

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EXHIBIT C

Exhibit Q to tpSEF Inc.'s Form SEF

(Marked Version)

[FOIA Confidential Treatment Requested]