



TRADITION SEF, LLC

Bennett Kirschner
General Counsel and Secretary

July 24, 2023

VIA E-MAIL (submissions@cftc.gov)

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) self-certification of rule change requiring certain SOFR and SONIA swaps to be subject to the trade execution requirement on August 7, 2023.

Tradition SEF Submission No. 2023-04

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”) Regulations 40.6(a), Tradition SEF, LLC (“Tradition SEF” or “The SEF”) hereby submits for Commission review a Revised Product Listing and Terms and Conditions for the Interest Rate Swap Asset Class and notifies the Commission of such revisions as follows:

Tradition SEF is filing to amend its Appendix A to Tradition SEF Rulebook Interest Rate Swap Product Listing to conform with the CFTC’s approval of a “made-available-to-trade” (MAT) determination submitted by TW SEF LLC for certain U.S. Dollar (USD) Secured Overnight Financing Rate (SOFR) overnight index swaps (OIS) and Pound Sterling (GBP) Sterling Overnight Index Average (SONIA) OIS. The IRS swaps available to trade on Tradition SEF that will be subject to subject to the trade execution Requirement under section 2(h)(8) of the Commodity Exchange Act (CEA), are outlined in the revised Appendix A Section 3 with an effective date of August 7, 2023.

Tradition SEF has revised Appendix A to Tradition SEF Rulebook Interest Rate Swap Product Listing as follows:

A table listing swaps subject to the trade execution requirement has been inserted into Section 3.

Tradition SEF hereby certifies compliance with applicable provisions of the Act, including 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. In particular, the products listed in this submission adhere to Core Principles 3 (“Swaps Not Readily Susceptible to Manipulation”) and 7 (“Financial Integrity of Transactions”) and CFTC Rules 37.300-301 and 37.700-37.702.

Tradition SEF hereby certifies that the products 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 product 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/news/>*), 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 bennett.kirschner@tradition.com. Please reference Tradition SEF Submission No. 2022-02 in any related correspondence.

Sincerely,

Bennett Kirschner
General Counsel and Secretary

Att.
Exhibit A

EXHIBITS

A) Redline and clean versions of Appendix A to Tradition SEF Rulebook - Interest Rate Swap Product Listing

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