

October 30, 2014

**By Email: [submissions@cftc.gov](mailto:submissions@cftc.gov)**

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

Re: *tpSEF Inc. – Regulation 40.2 Certification of CDS Index Contract – North America Investment Grade 5Y Swaps and Swaptions (#14-19P)*

Ladies and Gentlemen:

tpSEF Inc. (“tpSEF”) hereby notifies the Commodity Futures Trading Commission (the “Commission”) of its intent to list CDS Index Contract – North America Investment Grade 5Y Swaps and Swaptions (the “Contract”) on tpSEF’s swap execution facility. tpSEF intends to list these Contracts on November 3, 2014.

Pursuant to Commission Regulation 40.2, this submission includes:

- i. A copy of the submission cover sheet in accordance with the instructions in Appendix D to Part 40 of the Commission’s regulations;
- ii. The intended listing date – November 3, 2014;
- iii. A certification by tpSEF that: (a) the Contract complies with the Commodity Exchange Act, as amended, and the Commission regulations thereunder; and (b) concurrent with this submission, tpSEF posted on its website: (i) a notice of pending certification of the Contract, and (ii) a copy of this submission, attached as Exhibit A;
- iv. The Contract’s terms and conditions, attached as Exhibit B; and
- v. An explanation and analysis of the Contract’s compliance with applicable core principles and Commission regulations, attached as Exhibit C.

tpSEF is listing the Contract by virtue of updating the terms and conditions of CDS Index Contract – North America Investment Grade 5Y submitted to the Commission for self-certification pursuant to Commission Regulation 40.2 on September 29, 2013. A copy of the terms and conditions marked to show changes from the version submitted on September 29, 2013 is attached as Exhibit D.

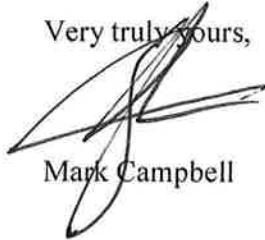
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Questions regarding this submission should be directed to Brian Donnelly, Chief Compliance Officer, at (201) 984-6956 or by email at [bddonnelly@tullettprebon.com](mailto:bddonnelly@tullettprebon.com), or to Mark Campbell, Chief Operating Officer, at (201) 557-5786 or by email at [mcampbell@tullettprebon.com](mailto:mcampbell@tullettprebon.com).

Very truly yours,

A handwritten signature in black ink, appearing to be 'Mark Campbell', written over the typed name.

Mark Campbell

Enclosures

cc: Division of Market Oversight (Email: [dmosubmissions@cftc.gov](mailto:dmosubmissions@cftc.gov))  
Brian Donnelly (Email: [bddonnelly@tullettprebon.com](mailto:bddonnelly@tullettprebon.com))