

Refinitiv US SEF LLC
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November 21, 2022

SUBMITTED VIA PORTAL

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

Re: Submission 22-02: Refinitiv US SEF LLC – Amendments to Rulebook

Ladies and Gentlemen:

Pursuant to Commodity Futures Trading Commission (“Commission”) Regulation 40.6(a), Refinitiv US SEF LLC (“RSEF”) hereby self-certifies the amendments to its Rulebook identified in Exhibit A. The Rulebook has been amended in order to reflect certain amendments to RSEF’s requirements related to the reporting counterparty hierarchy under Commission Regulation 45.8, and to clarify requirements when a Participant’s legal entity identifier is changed in any way. The amended Rulebook will become effective on December 6, 2022.

A concise explanation and analysis of the amendments to the Rulebook and their compliance with applicable provisions of the Commodity Exchange Act (“CEA”) is attached hereto as Exhibit A, and the amendments showing changes against the version submitted to the Commission in Submission 21-01-A on February 17, 2021, is attached hereto as Exhibit B.

RSEF 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 RSEF’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.

Michelle Weiler
318 West Adams Street
Chicago, IL 60606
Phone: (847) 826 8080
Email: Michelle.Weiler@lseg.com

Sincerely,

A handwritten signature in black ink that reads "Michelle Weiler". The signature is fluid and cursive, with a long horizontal flourish at the end.

Michelle Weiler
Chief Compliance Officer

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

Swati Shah, 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 reflect certain amendments to RSEF’s requirements related to the reporting counterparty hierarchy under Commission Regulation 45.8, and to clarify requirements when a Participant’s legal entity identifier is changed in any way. The amended Rulebook showing changes against the version submitted to the Commission in Submission 21-01-A on February 17, 2021, is attached hereto as Exhibit B.

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

Amendment and Explanation	Relevant Law, Regulation or Guidance
<u>Rule 307</u> Added requirement that participants must inform Refinitiv SEF of any amendments to LEIs	Core Principle 2
<u>Rule 402(a)(4)</u> Clarifies the reporting hierarchy for circumstances where Commission Regulation 45.8 requires the counterparties to agree which counterparty will be the reporting counterparty	Commission Regulation 45.8
<u>Various Rules</u> Removed references to “CFTC Interim Compliant Identifier” and “CICI” in order to reference only “Legal Entity Identifier”	Core Principle 2

EXHIBIT B
Rulebook Amendments