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March 11, 2024

SUBMITTED VIA PORTAL

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

Re: Submission 24-01: Refinitiv US SEF LLC – Amendments to Rulebook

Ladies and Gentlemen:

Pursuant to Commodity Futures Trading Commission (the “Commission”) Regulation 40.6(a), LSEG FX SEF (“LSEG SEF”), operated by Refinitiv US SEF LLC, hereby self-certifies the amendments to its Rulebook identified in Exhibit A. The Rulebook has been amended in order to incorporate rules related to voluntary clearing of swaps executed on LSEG SEF’s matching order book. The amended Rulebook will become effective on March 25, 2024.

A concise explanation and analysis of the amendments to the Rulebook and their compliance with applicable provisions of the Commodity Exchange Act (the “CEA”) is attached hereto as Exhibit A, and the amendments showing changes against the version submitted to the Commission on November 20, 2023, is attached hereto as Exhibit B.

LSEG SEF hereby certifies that: (i) the amended Rulebook complies with the CEA and the Commission’s regulations promulgated thereunder, and (ii) a notice and copy of this submission is being concurrently posted on LSEG SEF’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.

Stephanie Feldt
Chief Compliance Officer
28 Liberty Street, New York, NY 10005
Stephanie.feldt@lseg.com



Sincerely,

Stephanie Feldt

Stephanie Feldt
Chief Compliance Officer

cc: Nancy Markowitz, Deputy Director, Division of Market Oversight, Market Review Branch

Marilee Dahlman, 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 incorporate rules related to voluntary clearing of swaps executed on LSEG SEF’s matching order book. The amended Rulebook showing changes against the version submitted to the Commission on November 20, 2023, 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>Legal Information</u> Added the European Central Bank Foreign Exchange Contact Group to the list of regional committees.	Clerical revision
<u>Introduction</u> Added “acting as a Clearing Member for a Participant” to the list of activities that cause a market participant to agree to the representations and undertakings set forth in the Introduction. Added a requirement that Participants agree to comply with the Clearing House Rules for any cleared swaps.	Core Principle 2
<u>Definitions</u> Added definitions of “Clearing Exception,” “Clearing Exception Form,” “Clearing Exempt Transaction,” “Clearing House” or “Derivatives Clearing Organization,” “Correcting Trade,” “Error Trade,” “Offsetting Trade,” “Risk-Based Limits,” and “SEF Market Participant.”	CFTC Regulation 37.702(b) (General financial integrity) CFTC No-Action Letters 17-27 and 20-01 (related to error trades and swaps that fail to clear)



LSEG

Amendment and Explanation	Relevant Law, Regulation or Guidance
<p><u>Rule 301(a)(9)</u></p> <p>Added a requirement that Participants wishing to submit swaps for clearing either be a member of a Derivatives Clearing Organization or deliver to the SEF evidence that at least one Clearing Member has agreed to accept Contracts for clearing into the account of such Participant.</p> <p>Re-numbered Rules 301(a)(10)-(12).</p>	<p>CFTC Regulation 37.702(b) (General financial integrity)</p> <p>CFTC Letter, Staff Guidance on Swaps Straight-Through Processing (Sept. 26, 2013)</p>
<p><u>Rules 301(e)-(g)</u></p> <p>Added requirements that (1) Participants that are not Account Managers disclose to the SEF the Clearing Members with which they have clearing relationships, and (2) Participants that are Account Managers disclose to the SEF the Clearing Members with which their Clients have clearing relationships.</p> <p>Added a prohibition from submitting swaps for clearing for Participants and Clients that do not have a clearing relationship with a Clearing Member.</p>	<p>CFTC Regulation 37.702(b) (General financial integrity)</p> <p>CFTC Letter, Staff Guidance on Swaps Straight-Through Processing (Sept. 26, 2013)</p>
<p><u>Rule 311</u></p> <p>Added “acting as a Clearing Member for a Participant” to the list of activities that cause a market participant to agree to the representations and undertakings set forth in the Introduction.</p> <p>Added a requirement that Participants agree to comply with the Clearing House Rules for any cleared swaps.</p>	<p>Core Principle 2</p>
<p><u>Rule 402(a)(6).</u></p> <p>Removed references to CFTC Interim Compliance Identifiers (“CICI”).</p>	<p>Clerical revision</p>



Amendment and Explanation	Relevant Law, Regulation or Guidance
<p><u>Rule 402(a)(6)(viii)</u></p> <p>Added a requirement that Participants executing Cleared Swaps provide the SEF with an indication that the Transaction will be cleared, and the name of the selected Clearing Member (if the Participant has a relationship with more than one Clearing Member).</p>	<p>CFTC Regulation 37.702(b) (General financial integrity)</p> <p>CFTC Letter, Staff Guidance on Swaps Straight-Through Processing (Sept. 26, 2013)</p>
<p><u>Rule 402(b)(2)</u></p> <p>Added a Rule stating that Continuation Data for any cleared Transaction will be reported to the relevant Swap Data Repository by the relevant Derivatives Clearing Organization</p>	<p>CFTC Regulations 45.4(b) and 45.8(i)</p>
<p><u>Rule 404(a)</u></p> <p>Amended the rules for transaction confirmations to create separate rules for uncleared and cleared swaps.</p>	<p>CFTC Regulation 37.6(b)</p>
<p><u>Rules 405(b) and (c)</u></p> <p>Stated that Clearing Members will be subject to annual audit trail reviews.</p>	<p>CFTC Regulations 37.205(c)(1)</p>
<p><u>Rule 505(a)(1)</u></p> <p>Required Clearing Members to maintain books and records.</p>	<p>CFTC Regulation 37.502</p>
<p><u>Rule 513(a)(1)</u></p> <p>Removed rules related to error trades, which have been moved to Chapter 8.</p>	<p>Clerical revision</p>
<p><u>Rule 601(a)</u></p> <p>Added reference to the SEF offering Permitted Swaps that are intended to be cleared.</p>	<p>Clerical revision</p>



Amendment and Explanation	Relevant Law, Regulation or Guidance
<p><u>Rule 702.A</u></p> <p>Added description of the SEF's new Matching Order Book, on which swaps that are intended to be cleared may be executed. The rule describes the matching engine, which groups bids and offers together and randomly sorts such bids and offers before executing them against one another.</p> <p>The rule also describes the types of orders and values for time in force for order submitted on the Matching Order Book, as well as certain rules for trading on the Matching Order Book.</p>	CFTC Regulation 37.201(b)
<p><u>Rule 707</u></p> <p>Removed reference to effective date of CFTC regulations related to post-trade name give-up, because these dates have already passed.</p>	Clerical revision
<p><u>Rule 801</u></p> <p>Added a Rule stating that swaps subject to mandatory clearing or voluntarily cleared must be cleared at a registered or exempt DCO, and requiring Participants relying on an exception from clearing to provide a Clearing Exception Form to the SEF.</p>	CFTC Regulation 37.702(b) (General financial integrity)
<p><u>Rule 802</u></p> <p>Added a Rule requiring that Participants wishing to clear swaps executed on the SEF either be a Clearing Member or have a clearing account with a Clearing Member who has undertaken to provide a guarantee to the Clearing House.</p>	CFTC Regulation 37.702(b) (General financial integrity) CFTC Letter, Staff Guidance on Swaps Straight-Through Processing (Sept. 26, 2013)
<p><u>Rule 803</u></p> <p>Added a Rule stating that Clearing Members shall be subject to the SEF's jurisdiction by virtue of agreeing to facilitate clearing of swaps executed on the Platform, and permitting Clearing Members to revoke their authorization and guarantee of any SEF Participant.</p>	Core Principle 2



Amendment and Explanation	Relevant Law, Regulation or Guidance
<p><u>Rule 804</u></p> <p>Added a Rule clarifying that the Clearing House rules shall apply to the clearing services provided by the Clearing House, and shall govern the rights and obligations of purchasers and sellers under cleared Contracts.</p>	<p>Core Principle 2</p>
<p><u>Rule 805</u></p> <p>Added a Rule stating that the SEF will submit (or cause to be submitted) swaps for clearing within 10 minutes of execution; setting forth rules for the affirmation of cleared swaps; and setting forth rules related to acceptance and rejection of swaps for clearing by the Clearing House.</p>	<p>CFTC No-Action Letter 15-67 (Straight Through Processing and Affirmation of SEF Cleared Swaps)</p> <p>CFTC Letter, Staff Guidance on Swaps Straight-Through Processing (Sept. 26, 2013)</p>
<p><u>Rule 806</u></p> <p>Added a Rule requiring Clearing Members to establish risk-based limits and conduct pre-execution credit checks of all swaps executed on the Platform that are intended to be cleared.</p>	<p>CFTC Letter, Staff Guidance on Swaps Straight-Through Processing (Sept. 26, 2013)</p>
<p><u>Rule 807</u></p> <p>Added a Rule governing the circumstances under which a swap that fails to clear can be corrected or re-submitted for clearing, and setting forth the prohibition on post-trade name give-up from CFTC Regulations.</p>	<p>CFTC No-Action Letters 17-27 and 20-01 (related to error trades and swaps that fail to clear)</p> <p>CFTC Regulation 37.9(e)</p> <p>CFTC Regulation 37.9(f)</p>
<p><u>Rule 808</u></p> <p>Added a Rule prohibiting Participants from requiring breakage agreements to be in place with a counterparty in connection with swaps that are intended to be cleared.</p>	<p>CFTC Letter, Staff Guidance on Application of Certain Commission Regulations to SEFs (Nov. 14, 2013)</p>
<p><u>Chapter 9 (Trading Practices and Business Conduct)</u></p> <p>Incorporated new defined term “SEF Market Participant” to clarify that the SEF’s rules related to potential violations and disciplinary actions apply to Clearing Members in addition to Participants.</p>	<p>Core Principle 2</p>



Amendment and Explanation	Relevant Law, Regulation or Guidance
<p><u>Rules 924(a) and 925</u></p> <p>Added statement that the SEF's rules related to position limits shall not contravene rules set forth by the Clearing House.</p>	Clerical revision
<p><u>Rule 927</u></p> <p>Changed reference from "individuals" to "Persons."</p>	Clerical revision
<p><u>Rule 928</u></p> <p>Amended Rule related to pre-execution credit checks to now refer to swaps that are intended to be cleared.</p>	CFTC Letter, Staff Guidance on Swaps Straight-Through Processing (Sept. 26, 2013)
<p><u>Rule 1001(a)</u></p> <p>Added Clearing Members to the list of persons or entities within the definition of the term "SEF Market Participants."</p>	Core Principle 2
<p><u>Rule 1001(h)(1)</u></p> <p>Added a Rule stating that the SEF may hold a Clearing Member liable for, and impose sanctions against such Clearing Member for such Clearing Member's own acts and omissions that constitute a violation as well as or for the acts or omissions of any agent or representative of such Clearing Member</p>	Core Principle 2
<p><u>Rule 1015</u></p> <p>Incorporated new defined term "SEF Market Participant" to clarify that the SEF's rules related to disciplinary actions apply to Clearing Members in addition to Participants.</p>	Core Principle 2
<p><u>Chapter 11</u></p> <p>Incorporated new defined term "SEF Market Participant" to clarify that the SEF's rules related to arbitrations apply to Clearing Members in addition to Participants.</p>	Core Principle 2



Amendment and Explanation	Relevant Law, Regulation or Guidance
<p><u>Rule 1301 (NDF Contract Specification)</u></p> <p>Amended Rule to state that settlement procedures and Spot FX calculations for cleared swaps will be in accordance with the Clearing House Rules, and setting forth the currency pairs for which clearing will be available.</p>	Core Principle 2



EXHIBIT B
Rulebook Amendments