

August 23, 2013

**Submitted via CFTC Portal**

Secretary of the Commission  
Office of the Secretariat  
U.S. Commodity Futures Trading Commission  
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Re: *tpSEF Inc. – Application for Registration as a Swap Execution Facility on Form SEF Pursuant to Section 5h of the Commodity Exchange Act and Part 37 of the Regulations of the U.S. Commodity Futures Trading Commission*

Ladies and Gentlemen:

tpSEF Inc. (“tpSEF” or the “Applicant”) hereby submits the enclosed Form SEF and accompanying exhibits (the “Application”) for registration with the U.S. Commodity Futures Trading Commission (“Commission”) as a swap execution facility (“SEF”) pursuant to Section 5h of the Commodity Exchange Act, as amended, and Commission Regulation § 37.3(b). The Applicant hereby requests that the Commission issue an order granting it temporary registration as a SEF pursuant to Commission Regulation § 37.3(c).

The Applicant further requests that the Commission grant the Applicant’s application for full registration. Pursuant to Commission Regulation § 37.3(b)(1)(iii), tpSEF hereby requests from the Commission a unique, extensible, alphanumeric code for the purpose of identifying tpSEF pursuant to Part 45 of the Commission’s Regulations.

tpSEF is separately filing, pursuant to Commission Regulations § 37.3(b)(2) and § 145.9, a petition for confidential treatment of those portions of the Application that are not required by Commission Regulation § 40.8(a) to be made publicly available on the grounds that disclosure would reveal the Applicant’s trade secrets, as well as confidential commercial and financial information. We request this confidential treatment for an indefinite period of time.

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Questions regarding this Application should be directed to Brian Donnelly, Chief Compliance Officer, at [bddonnelly@tullettprebon.com](mailto:bddonnelly@tullettprebon.com) or (201) 984-6956.

Very truly yours,



Brian D. Donnelly

Enclosures provided through the CFTC Portal

cc: Division of Market Oversight (Email: [dmosubmissions@cftc.gov](mailto:dmosubmissions@cftc.gov))  
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