



MarketAxess SEF Corporation  
299 Park Avenue, 10th Floor  
New York, NY 10171

July 12, 2013

**VIA U.S. Mail**

Office of the Secretariat  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, N.W.  
Washington, DC 20581

RE: Request for Temporary Registration and Full Registration as a Swap Execution Facility

To Whom it May Concern:

MarketAxess SEF Corporation ("MarketAxess SEF") hereby submits this Swap Execution Facility ("SEF") Application pursuant to Section 5h of the Commodity Exchange Act and Part 37 of the regulations promulgated by the Commodity Futures Trading Commission ("CFTC" or "Commission"). MarketAxess SEF respectfully requests that the Commission grant MarketAxess SEF's application for temporary registration pursuant to Commission regulation 37.3(c).

MarketAxess SEF further requests that the CFTC grant MarketAxess SEF's application for full registration pursuant to Commission regulation 37.3(b). Pursuant to Commission regulation 37.3(b)(1)(iii), MarketAxess SEF requests from the Commission a unique, extensible, alphanumeric code for the purpose of identifying the SEF pursuant to part 45 of the Commission's regulations.

MarketAxess SEF has submitted to the Assistant Secretary of the Commission for Freedom of Information a request for confidential treatment of the documents listed on Appendix A hereto (the "Confidential Information"). The basis for this petition for confidential treatment is CFTC Regulation Section 145.9(d)(1)(ii), in that the Confidential Information contains trade secrets and confidential commercial and/or financial information. We request this confidential treatment for an indefinite period.

If you have any questions regarding this application, please contact me at (212) 813-6280.

Sincerely,



Ron Steinfeld  
Chief Compliance Officer

cc: Commodity Futures Trading Commission (Email: [secretary@cftc.gov](mailto:secretary@cftc.gov))

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

Richard Shilts  
Nancy Markowitz  
Amir Zaidi

**Appendix A**  
Confidential Information

| <b>Exhibit</b> | <b>Description</b>  |
|----------------|---|
| A              | List of control persons of MarketAxess SEF  |
| B-2            | Compensation of directors of MarketAxess SEF  |
| D-2            | Addresses for legal service of process  |
| E              | Qualifications of MarketAxess SEF's professional employees                                    |
| F              | Staffing requirements of MarketAxess SEF; name and qualifications of each key staff person    |
| H              | Pending non-routine legal proceedings   |
| I-1            | Statement of Financial Condition of MarketAxess SEF   |
| I-2            | Operating costs, financial resources, and sources of operational resources of MarketAxess SEF |
| J              | Financial information of certain MarketAxess SEF affiliates                                   |
| K              | MarketAxess SEF fee schedule  |
| N-1            | Regulatory Services Agreement between MarketAxess SEF and the Regulatory Service Provider     |
| N-2            | MarketAxess SEF User License Agreement  |
| O-1            | Regulatory Service Provider's compliance manual   |
| O-2            | MarketAxess SEF in-house compliance functions   |
| P              | MarketAxess SEF disciplinary and enforcement procedures; alternative dispute resolution       |
| Q              | Functional descriptions of MarketAxess SEF's RFQ and Order Book systems                       |
| R              | MarketAxess SEF rules prohibiting specific trade practice violations                          |
| S              | Discussion of how trading data will be maintained   |
| V-1            | Technology questionnaire  |
| V-2            | Exhibit V attachments   |