

June 5, 2014

CONFIDENTIAL TREATMENT REQUESTED

VIA E-MAIL (submissions@cftc.gov)

Ms. Melissa Jurgens
Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

RE: CFTC Regulation 40.6(a) Certification. Notification of Amendments to Tradition SEF, Inc. Platform Supplement. Tradition SEF Submission No. 14-17 (CONFIDENTIAL TREATMENT REQUESTED).

Dear Ms. Jurgens:

Pursuant to Section 5c(c) of the Commodity Exchange Act, as amended (the "Act"), and Commodity Futures Trading Commission (the "CFTC" or the "Commission") Regulation 40.6, Tradition SEF, Inc. ("Tradition SEF") hereby notifies the Commission of amendments to its Rulebook, to be effective and implemented by Tradition as of June 19, 2014, which is the day after the tenth business day of the Commission's review period.


We have identified in Exhibit A the modified rule within the Trad-X Platform Supplement (the "Supplement"), which governs the market exposure time for certain pre-arranged trades that are introduced into the order book for interest rate swap products. In summary, SEF Rule 529 (Crossing of Prearranged, Pre-Negotiated, and Noncompetitive Transactions Prohibited) stipulates a market exposure period of fifteen (15) seconds for crossing such transactions, unless such shorter time is specified in a Platform Supplement. Revised Platform Supplement Rule S1-302 reduces this market exposure time period to five (5) seconds for interest rates swaps on the Trad-X Platform. Attached as Exhibit B is the redlined version of the Supplement. Tradition SEF has simultaneously submitted a request for confidential treatment for Exhibits A and B. A copy of that request for confidential treatment is included with this submission. Tradition SEF continues to be in compliance with applicable provisions of the Act, including the SEF core principles (the "Core Principles") as set forth in Section 5h of the Commodity Exchange Act and Part 37 of the Commission's regulations thereunder. In particular, Tradition SEF has determined that it is in compliance with Core Principles 1 (Compliance with Core Principles) and 4 (Monitoring of Trading and Trade Processing).

Tradition SEF hereby certifies that the rule amendments comply with the Commodity Exchange Act and the Commission's regulations promulgated thereunder. No substantive opposing views were expressed that were not incorporated into the rule amendments. Tradition SEF hereby certifies that it has posted a notice of pending certification with the Commission and a copy of the submission on its website (*see, e.g.,* <http://www.traditionsef.com/news/>), concurrent with the filing of this submission with the Commission.

*Tradition SEF, Inc., 255 Greenwich Street, 4th floor, New York, NY 10007
212 791 4500 www.traditionsef.com*

Should you require additional information related to this submission, please contact the undersigned at 212-791-3497 or eric.earnhardt@tradition-na.com. Please reference Tradition SEF Submission No. 14-17 in any related correspondence.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Earnhardt". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Eric Earnhardt
Chief Compliance Officer

Exhibit A
Exhibit B