



TRADITION SEF, Inc.

Scot J. Halvorsen
Senior Regulatory Counsel and Secretary
Legal Department

September 16, 2016

VIA E-MAIL (submissions@cftc.gov)

Mr. Christopher Kirkpatrick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

**RE: CFTC Regulation 40.6(a) Rule Certification.
Notification of Amendments to Tradition SEF, Inc. Rulebook.
Tradition SEF Submission No. 2016-07**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c) of the Commodity Exchange Act, as amended (the "Act"), and Commodity Futures Trading Commission ("CFTC" or the "Commission") Regulation 40.6(a), Tradition SEF, Inc. ("Tradition SEF") hereby notifies the Commission of amendments to the Tradition SEF Rulebook (the "Rulebook"), to be effective and implemented by Tradition SEF as of October 3, 2016. Attached as Exhibit B is a redlined version of the Rulebook reflecting the amendments described herein.

We have identified on Exhibit A amendments of Rules 504 and 512 and compliance with the SEF core principles ("Core Principles") as set forth in Section 5h of the Act and Part 37 of the Commission's regulations promulgated thereunder. Additionally, effective October 3, 2016 Tradition SEF will no longer utilize the Volbroker Platform for the execution of FX Options. Execution of FX Options on and after October 3, 2016 will be facilitated through the Tradition SEF BrokerSuite FXO portal. Tradition SEF is making this change to its system to provide more efficient access to SEF execution pursuant to the Dodd-Frank Act and CFTC open access mandates and to achieve operational efficiencies. Accordingly, the Volbroker FX Options Platform Supplement is removed from the Tradition SEF Rulebook in its entirety.

Tradition SEF continues to comply with the Core Principles. In particular, Tradition SEF has determined that it is in compliance with Core Principle 1 (Compliance with Core Principles), Core Principle 2 (Compliance with Rules), Commission Regulation 37.09 and Parts 43 and 45 of the Commission's Regulations, as further described in the compliance table provided in Exhibit A.

Tradition SEF hereby certifies that the rule amendments comply with the 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*, <http://www.traditionsef.com/regulatory/>), concurrent with the filing of this submission with the Commission.

Should you require additional information related to this submission, please contact the undersigned at (212) 377-2337 or scot.halvorsen@tradition.com. Please reference Tradition SEF Submission No. 2016-07 in any related correspondence.

Sincerely,



Scot J. Halvorsen
Senior Regulatory Counsel and Secretary

Attachments: Exhibit A – Compliance with Core Principles table
Exhibit B – Tradition SEF Rulebook (redline format)

EXHIBIT A
Compliance with Core Principles

Rule	Rule Change	Explanation and Analysis of the operation, purpose, and effect of the proposed rule or rule amendment and its compliance with applicable provisions of the Act, including core principles, and the Commission's regulations thereunder.
504	Tradition SEF amended Rule 504, Execution Methods, to clarify that Permitted Transactions may be privately negotiated or arranged apart from Tradition SEF and entered into a SEF trade capture system or GUI for which an Authorized Trader or Authorized Broker has been granted access.	The amendment to Rule 504 complies with Commission Regulation 37.09, which provides, in part, that a swap execution facility may offer any method of execution for each Permitted Transaction.
512	Tradition SEF amended Rule 512, Swap Data Reporting, to clarify that Tradition SEF reports Required Swap Creation Data and Swap Transaction and Pricing Data for the commodity asset class to either CME Swap Data Repository or ICE Trade Vault.	The amendment to Rule 512 complies with Parts 43 (Swap Data Recordkeeping and Reporting Requirement) and 45 (Swap Data Recordkeeping and Reporting Requirements) of the Commission's Regulations.

EXHIBIT B

Redlined Rulebook

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