



TRADITION SEF, Inc.

April 17, 2015

**VIA E-MAIL ([submissions@cftc.gov](mailto:submissions@cftc.gov))**

Mr. Christopher Kirkpatrick  
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 Revisions to the Tradition SEF, Inc.'s Trad-X Interest Rate Swap (IRS) Trading Platform Supplement. Tradition SEF Submission No. 2015-05.**

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 that it is revising its Trad-X Interest Rate Swap (IRS) trading platform supplement (the "Platform Supplement"), effective April 24, 2015.

Tradition SEF Rule 529(b)(3) (Crossing of Prearranged, Pre-Negotiated, and Noncompetitive Transactions Prohibited) stipulates a market exposure time period of fifteen (15) seconds for crossing transactions, unless such shorter time is specified in a platform supplement. Currently, Platform Supplement Rule S1-302 reduces such market exposure time period to five (5) seconds for interest rates swaps trading on the Trad-X Platform. Pursuant to the request of the Commission's staff, the market exposure period of five (5) seconds for interest rates swaps in Platform Supplement Rule S1-302 is being increased from five (5) seconds to fifteen (15) seconds. There are no further revisions to the Platform Supplement.

Tradition SEF hereby certifies that the revision to the Platform Supplement complies 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*, <http://www.traditionsef.com/news/>), concurrent with the filing of this submission with the Commission.



TRADITION SEF, Inc.

Should you require additional information related to this submission, please contact the undersigned at (212) 377-2337 or [scot.halvorsen@tradition.com](mailto:scot.halvorsen@tradition.com). Please reference Tradition SEF Submission No. 2015-05 in any related correspondence.

Sincerely,

A handwritten signature in blue ink, appearing to read "Scot J. Halvorsen", is written over the word "Sincerely,".

Scot J. Halvorsen  
Senior Regulatory Counsel