Tradition

Bennett Kirschner
General Counsel and Secretary

TRADITION SEF, LLC

July 18, 2022

VIA CFTC Portal

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 Amendments to Tradition SEF, LLC's Trad-X USD IRS Liquidity Provider Program
Tradition SEF Submission No. 2022-06

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, Tradition SEF, Inc. ("Tradition SEF") hereby notifies the Commission of modifications to the Trad-X USD IRS Liquidity Provider Program ("LPP"), as described below, to be effective for market participants on August 1, 2022.

Pursuant to Tradition SEF Inc. Rule 536, Tradition SEF has modified certain terms of the Trad-X USD IRS Liquidity Provider Program as previously noticed in Notices to Participants 20-05 and 19-04. **A petition for confidential treatment will accompany this request and be filed with the Secretary's office.**

We have identified in Exhibit A the rule modifications and compliance with the SEF core principles ("Core Principles") as set forth in Section 5h of the Commodity Exchange Act and Part 37 of the Commission's regulations promulgated thereunder. A copy of Participant Notice 22-08 is attached hereto as Exhibit B which contains the latest version of the LPP.

Tradition SEF continues to be in compliance with applicable provisions of the Act, including the Core Principles. In particular, Tradition SEF has determined that it is in compliance with Core Principles 1 (Compliance with Core Principles) and 2 (Compliance with Rules), as further described in the compliance chart attached as Exhibit A.

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* 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 bennett.kirschner@tradition.com.   Please reference Tradition SEF Submission No. 2022-06 in any related correspondence.

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Sincerely,

/s/ Bennett Kirschner
General Counsel and Secretary

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Att.:
Exhibit A
Exhibit B

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.
Rule 536	Modifications to the Trad-X USD IRS Liquidity Provider Program ("LPP").	The modifications to the Trad-X USD IRS LPP demonstrate Tradition SEF's adherence to open access principles. Accordingly, Tradition is promoting a fair, transparent platform. The modifications comply with Core Principle 2 (Compliance with Rules) and specifically with CFTC Rule 37.202, which requires impartial access to the SEF and transparent criteria governing access that is applied in a fair and nondiscriminatory manner. CFTC Rule 37.202 also requires a SEF to require that an eligible contract participant ("ECP") consent to its jurisdiction before the ECP can access the SEF. By complying with Core Principle 2, Tradition SEF demonstrates its compliance with Core Principle 1 (Compliance with Core Principles) and CFTC Regulation 37.100, which requires that a SEF comply with any requirement that the CFTC may impose by rule or regulation.

EXHIBIT B

A copy of Participant Notice 22-08

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EXHIBIT B IS SUBJECT TO A REQUEST FOR CONFIDENTIAL TREATMENT