



TRADITION SEF, LLC

Bennett Kirschner
General Counsel and Secretary

November 4, 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) Rule Certification.
Notification of Amendments to StreamGlobal Credit Default Swap Trading
Platform Supplement.
Tradition SEF Submission No. 2022-07.**

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 StreamGlobal Credit Default Swap Trading Platform Supplement to the Tradition SEF Rulebook (the “Platform Supplement”), to be effective and implemented by Tradition SEF as of November 21, 2022. Attached as Exhibit B is a redlined version of the Platform Supplement reflecting the amendments described herein.

We have identified on Exhibit A the updated Platform Supplement which makes amendments to Rule S3-104(b)(iii) and adds Appendix 3 to the Platform Supplement, in compliance with the SEF core principles (the “Core Principles”) as set forth in Section 5h of the Act and Part 37 of the Commission’s regulations promulgated thereunder.

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) and Core Principle 2 (Compliance with Rules), 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 bennett.kirschner@tradition.com. Please reference Tradition SEF Submission No. 2022-07 in any related correspondence.

Sincerely,

/s/ Bennett Kirschner
General Counsel and Secretary

Attachments: Exhibit A – Compliance with Core Principles table
Exhibit B – Platform Supplement (redline format)

EXHIBIT A
Compliance with Core Principles

Rules	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.
Platform Supplement Rule S3-104(b)(iii) and Appendix 3	Tradition SEF amended the Platform Supplement Rule S3-104(b)(iii) to update the work-up timing to conform with market practice and to add Appendix 3 to the Platform Supplement to add a new feature to the system, “Ad Hoc Mid-Price Match”.	<p>The purpose of this amendment to Rule S3-104(b)(iii) is to update the timing of the public phase of a work-up to 60 seconds to conform with market practice, and to add Appendix 3 to the Platform Supplement to add a new feature to the system, “Ad Hoc Mid-Price Match”, to enable Participants to source liquidity on a specific instrument versus “Continuous Mid-Price Match” that sources liquidity across all instruments. These changes are made to reflect changing market conditions.</p> <p>Tradition SEF continues to comply with Core Principles 2 (Compliance with rules) and 4 (Monitoring of trading and trade processing) and CFTC Regulation 37.200(c), which requires a SEF to “[e]stablish rules governing the operation of the facility, including rules specifying trading procedures to be used in entering and executing orders traded or posted on the facility, including block trades.”</p>

EXHIBIT B

Redlined StreamGlobal Credit Default Swap Trading Platform Supplement 3 version 2.4 to version 2.5

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