



TRADITION SEF, Inc.

April 15, 2014

VIA E-MAIL (submissions@cftc.gov)

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

RE: REVISED - CFTC Regulation 40.6(a) Certification. Request for Product Certification of Tradition SEF's Interest Rate Swap Asset Class Product Listing. Tradition SEF Submission No. 14-15R.

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 revisions to its Interest Rate Swap Asset Class Product Listing and Terms and Conditions for certain Interest Rate Swaps offered for trading on Tradition SEF. The listing date for products originally filed with Submission No. 14-15 was February 6, 2014. The expected listing date for the revisions contained herein is April 30, 2015.

Please note that Tradition SEF Submission No. 14-15R includes the following revisions to the Product Listing and Terms and Conditions set forth in the original submission. A redlined version of Submission No. 14-15 is attached hereto as Exhibit A to reflect the changes to Submission No. 14-15.

Appendix A, "General Information," which includes:

- A general discussion of the contracts, including that they are not readily susceptible to manipulation.
- A discussion of Index Reference Prices.
- Revised Product List, Table 1, which identifies the swaps that are available for clearing by a derivatives clearing organization.
- General Specifications and Definitions for Inflation Swaps, Chilean CLP Basis Swaps, Colombian UVR (Inflation) Interest Rate Swaps, Colombian Cross-Currency Interest Rate Swaps and Mexico TIIE and UDI Libor Swaps, Peruvian IRS and cross-currency basis swaps, and French Inflation Swaps.

Appendix B, "Product Specifications and Terms and Conditions"

- The products to be revised and certified by this submission are the following interest rate swaps: (i) Inflation Swaps; and (ii) Chilean CLP Basis Swaps, (iii) Colombian UVR (Inflation) Interest Rate Swaps, (iv) Colombian Cross-Currency Interest Rate Swaps and (v) Mexico TIIE and UDI



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Libor Swaps, (vi) Peruvian IRS and cross-currency basis swaps, and (vii) French Inflation Swaps

The remainder of Tradition SEF Submission No. 14-15 remains unchanged.

Tradition SEF hereby certifies its continued compliance with applicable provisions of the Act, including 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. In particular, the products listed in this submission adhere to Core Principles 3 ("Swaps Not Readily Susceptible to Manipulation") and 7 ("Financial Integrity of Transactions") and CFTC Regulations 37.300 – 301 and 700 – 702. Tradition SEF herein demonstrates that the contracts listed for trading on Tradition SEF are not readily susceptible to manipulation.

Tradition SEF hereby certifies that the products 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 product 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.

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. 14-15R in any related correspondence.

Sincerely,

A handwritten signature in blue ink, appearing to read "Scot Halvorsen", is written over a faint, larger version of the same signature.

Scot Halvorsen
Senior Regulatory Counsel

Attachments:

Exhibit A