



Tradition SEF, Inc.

Scot J. Halvorsen  
Senior Regulatory Counsel and Secretary  
Legal Department

June 18, 2018

**VIA ELECTRONIC PORTAL**

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.  
Amendments to Tradition SEF, Inc.'s Trad-X Interest Rate Swap (IRS) Platform Supplement.  
Tradition SEF Submission No. 2018-04 (CONFIDENTIAL TREATMENT REQUESTED).**

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 amending its Trad-X Interest Rate Swap (IRS) trading platform supplement (the "Platform Supplement"), effective as of July 2, 2018. Tradition SEF has simultaneously submitted a request for confidential treatment for the amendments and certain other provisions of the Platform Supplement that are highlighted in yellow on the redline version of the Platform Supplement filed with the Commission.

Tradition SEF has amended Appendix 3 (USD Interest Rate Products Minimum Order Size) of the Platform Supplement to revise the minimum order size applied to USD Spread Over Orders placed on the Trad-X Platform.

Pursuant to Commission Regulation 40.8, Tradition SEF hereby makes a redacted version of the Platform Supplement attached hereto as Exhibit A publicly available. Tradition SEF has simultaneously submitted a request for confidential treatment to the Commission for the amendments to Appendix 3 of the Platform Supplement and certain provisions of the Platform Supplement that are identified on Exhibit A highlighted in yellow. A copy of the request for confidential treatment is included with this submission.

A notice detailing these minimum order size changes has been sent to Trad-X participants.

Tradition SEF continues to be in compliance with applicable provisions of the Act, including the Core Principles. Tradition SEF hereby certifies that the rule amendments comply with the Commodity Exchange Act and the Commission's regulations 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) 337-2337 or [scot.halvorsen@tradition.com](mailto:scot.halvorsen@tradition.com). Please reference Tradition SEF Submission No. 2018-04 in any related correspondence.

Sincerely,

/s/ Scot J. Halvorsen  
Senior Regulatory Counsel and Secretary

**Exhibit A**

**Tradition SEF Trad-X Interest Rate Swap (IRS) Trading Platform Supplement**