



TRADITION SEF, Inc.

Scot J. Halvorsen
Senior Regulatory Counsel and Secretary
Legal Department

September 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 40.2(a) Rule Certification.
Notice of Product Certification of Tradition SEF's
Equity Asset Class.
Tradition SEF Submission No. 2018-09.**

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 40.2(a), Tradition SEF, Inc. ("Tradition SEF") hereby submits for the Commission's review a revised Equity Product Listing (the "Product Listing"). The effective listing date for the Product Listing is September 20, 2018.

The product being certified in the Product Listing is certain MSCI® Indices. Amendments to the prior version of the Product Listing are reflected in redline on attached Appendix A. The attached Product Listing replaces and supersedes Tradition SEF's previous Product Listing.

The following items are included in this product certification submission:

1. A general description of the contracts, including a certification that the contracts listed for trading on Tradition SEF are not readily susceptible to manipulation.
2. A description of the index reference prices.
3. Swaps subject to the trade execution requirement, if applicable.
4. Product lists.
5. General specifications and definitions.
6. Product specifications and terms and conditions

Tradition SEF hereby certifies its continued compliance with applicable provisions of the Act, including the SEF core principles (the "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 product listed in this submission adheres to Core Principles 3 (“Swaps Not Readily Susceptible to Manipulation”) and 7 (“Financial Integrity of Transactions”) and CFTC Rules 37.300-301, 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 Act and the Commission’s regulations promulgated thereunder. 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>), 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. 2018-09 in any related correspondence.

Sincerely,

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

Attachments: Appendix A

Appendix A