



TRADITION SEF, Inc.

Scot J. Halvorsen  
Senior Regulatory Counsel and Secretary  
Legal Department

November 29, 2017

**VIA E-MAIL (submissions@cftc.gov)**

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.  
Notification of Amendments to Tradition SEF, Inc. Rulebook.  
Tradition SEF Submission No. 2017-04**

Dear Mr. Kirkpatrick:

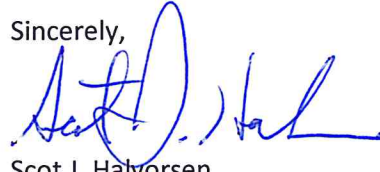
Pursuant to Section 5c(c) of the Commodity Exchange Act, as amended (the "Act"), and Commodity Futures Trading Commission ("CFTC" or the "Commission") Regulation 40.6(a), Tradition SEF, Inc. ("Tradition SEF") hereby notifies the Commission of amendments to the Tradition SEF Rulebook (the "Rulebook"), to be effective and implemented by Tradition SEF as of November 15, 2017. Attached as Exhibit B is a redlined version of the Rulebook reflecting the amendments described herein.

We have identified on Exhibit A amendments to Rules 509, 510 and 707 and compliance with the SEF core principles ("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 [scot.halvorsen@tradition.com](mailto:scot.halvorsen@tradition.com). Please reference Tradition SEF Submission No. 2017-04 in any related correspondence.

Sincerely,



Scot J. Halvorsen  
Senior Regulatory Counsel and Secretary

Attachments: Exhibit A – Compliance with Core Principles table  
Exhibit B – Tradition SEF Rulebook (redline format)

**EXHIBIT A**  
**Compliance with Core Principles**

| <b>Rules</b>       | <b>Rule Change</b>   | <b>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.</b> |
|--------------------|--|--|
| <b>509 and 707</b> | Tradition SEF amended Rules 509, 510 and 707 to update them to be consistent with current CFTC No-Action relief. | The amendments to Rules 509, 510 and 707 comply with Core Principle 1 (Compliance with core principles) and Core Principle 2 (Compliance with rules) by ensuring compliance with current CFTC No-Action relief.                                |

**EXHIBIT B**

**Redlined Rulebook**

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