



TRADITION SEF, Inc.

December 18, 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: CFTC Regulation 40.6(a) Certification. Notification of Public Availability of Tradition SEF, Inc.'s Trad-X Interest Rate Swap (IRS) Trading Platform Product Supplement. Tradition SEF Submission No. 14-23 (CONFIDENTIAL TREATMENT REQUESTED FOR CERTAIN PROVISIONS).

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 that it is making its Trad-X Interest Rate Swap (IRS) trading platform product supplement (the "Product Supplement") publicly available, effective January 6, 2015. Tradition SEF has simultaneously submitted a request for confidential treatment for certain provisions of the Product Supplement.

Tradition SEF has amended the Product Supplement to reflect the addition of a new "Split the Spread" order type. We have identified in Exhibit A the modified provisions in the Platform Supplement that relates the order types and compliance with SEF core principles ("Core Principles") as set forth in Section 5h of the Commodity Exchange Act and Part 37 of the Commission's regulations thereunder. Additionally, pursuant to Commission Regulation 40.8, Tradition SEF hereby makes the Product Supplement attached hereto as Exhibit B publicly available. Tradition SEF has simultaneously submitted a request for confidential treatment to the Commission for certain provisions of the Product Supplement that are identified on Exhibit B as "Redacted – Confidential Treatment Requested". A copy of that request for confidential treatment is included with this submission.

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, e.g.*,

<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 212-337-2337 or scot.halvorsen@tradition.com. Please reference Tradition SEF Submission No. 14-23 in any related correspondence.

Sincerely,

A handwritten signature in blue ink, appearing to read "Scot J. Halvorsen".

Scot J. Halvorsen
Senior Regulatory Counsel

Exhibit A

Amendments to Platform Supplement

Platform Supplement Rule	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.
TRAD-X PLATFORM SUPPLEMENT:		
Rule S1-304	Elimination of System-Related Error Trade where one party to a product transaction is a suppressed counterparty in relation to the other party to the product transaction.	The purpose of this deletion is to reflect actual practices. Tradition SEF is in compliance with the Core Principles, including Core Principle 4 (Monitoring of Trading and Trade Processing) and CFTC Regulation 37.405, which requires a SEF to establish and maintain risk control mechanisms to prevent and reduce the potential risk of market disruptions. The amendment enhances Tradition SEF's compliance with this regulation.
Appendix 1, Section 3(2)(f)	Addition of Split the Spread Order type.	The purpose of this addition is to permit Participants and Customers to submit Split the Spread Orders. The addition demonstrates Tradition SEF's compliance with Core Principle 4 (Monitoring of Trading and Trade Processing) and CFTC Regulation 37.400 because the rule clearly demonstrates to market participants the types of permissible Orders that can be executed on or subject to the rules of Tradition SEF.

Exhibit B

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