

SUBMISSION COVER SHEET	
Registered Entity Identifier Code (optional) 14-17 Date: June 5, 2014	
IMPORTANT: CHECK BOX IF CONFIDENTIAL TREATMENT IS REQUESTED.	
ORGANIZATION Tradition SEF, Inc.	
FILING AS A: DCM SEF DCO SDR ECM/SPDC	
TYPE OF FILING	
Rules and Rule Amendments	
Certification under § 40.6 (a) or § 41.24 (a)	
"Non-Material Agricultural Rule Change" under § 40.4 (b)(5)	
Notification under § 40.6 (d)	
Request for Approval under § 40.4 (a) or § 40.5 (a)	
Advance Notice of SIDCO Rule Change under § 40.10 (a)	
• Products	
Certification under § 39.5(b), § 40.2 (a), or § 41.23 (a)	
Swap Class Certification under § 40.2 (d)	
Request for Approval under § 40.3 (a)	
Novel Derivative Product Notification under § 40.12 (a)	
Tradition SEF, Inc.; 255 Greenwich Street, 4 <sup>th</sup> floor, New York, NY 10007	



RULE NUMBERS	
SEF Rule 529 as supplemented by IRS Trad-X Platform Supplement, Rule S-1 302: Crossing of Pre-Arranged Customer Orders.	
	n Supplement rule governing market exposure time for pre-arranged trades in Interest to the Tradition SEF Trad-X Order Book from fifteen (15) seconds to five (5) seconds.



June 5, 2014

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

Ms. Melissa Jurgens 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 Amendments to Tradition SEF, Inc. Platform Supplement. Tradition SEF Submission No. 14-17.

Dear Ms. Jurgens:

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 amendments to its Rulebook, to be effective and implemented by Tradition as of June 19, 2014, which is the day after the tenth business day of the Commission's review period.

We have identified in Exhibit A the modified rule within the platform supplement for interest rate swap products which govern the market exposure time for certain pre-arranged trades that are introduced into the order book. In summary, SEF Rule 529 (Crossing of Prearranged, Pre-Negotiated, and Noncompetitive Transactions Prohibited) stipulates a market exposure period of fifteen (15) seconds for crossing such transactions, unless such shorter time is specified in a Platform Supplement. Revised Platform Supplement Rule S1-302 reduces such market exposure period to five (5) seconds for interest rates swaps on the Trad-X Platform. Attached as Exhibit B is the redlined platform supplement. Tradition SEF has simultaneously submitted a request for confidential treatment for Exhibits A and B. 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 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. In particular, Tradition SEF has determined that it is in compliance with Core Principles) and 4 (Monitoring of Trading and Trade Processing).

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., <a href="http://www.traditionsef.com/news/">http://www.traditionsef.com/news/</a>), concurrent with the filing of this submission with the Commission.

Should you require additional information related to this submission, please contact the undersigned at 212-791-3497 or eric.earnhardt@tradition-na.com. Please reference Tradition SEF Submission No. 14-17 in any related correspondence.

Sincerely,

Eric Earnhardt

**Chief Compliance Officer** 

Exhibit A Exhibit B



# <u>Exhibit A</u> <u>Amendments to Platform Supplement</u>

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**EXHIBIT A AND ITS ATTACHMENTS ARE SUBJECT TO A REQUEST FOR CONFIDENTIAL TREATMENT** 



## EXHIBIT B REDLINED PLATFORM SUPPLEMENT

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**EXHIBIT B IS SUBJECT TO A REQUEST FOR CONFIDENTIAL TREATMENT**