



Thomson Reuters (SEF) LLC
3 Times Square
New York, NY 10036

February 27, 2017

VIA ELECTRONIC SUBMISSION

Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Re: Submission 17-01: Thomson Reuters (SEF) LLC – Contract Amendments

Ladies and Gentlemen:

Pursuant to Commodity Futures Trading Commission (the “Commission”) Regulation 40.2, Thomson Reuters (SEF) LLC (“TR SEF”) hereby notifies the Commission that it is amending certain contracts it submitted to the Commission on September 30, 2013 (each such contract, a “Contract”). Each amended Contract will become effective on March 1, 2017.

A concise explanation and analysis of the amendments to the Contracts and their compliance with applicable provisions of the Commodity Exchange Act (the “CEA”) is attached hereto as Exhibit A. A clean copy of each amended Contract specification is attached hereto as Exhibit B, and a copy of each amended Contract specification marked to show changes against the versions submitted to the Commission on September 30, 2013, is attached hereto as Exhibit C.

TR SEF hereby certifies that: (i) the amended Contracts comply with the CEA and the Commission’s regulations thereunder, and (ii) a notice and copy of this submission is being concurrently posted on TR SEF’s website. No substantive opposing views were expressed with respect to the amendments to the Contracts.

Please contact me using the information below if you have any questions regarding these amendments to the Contracts.

Wayne Pestone
1333 H Street
Suite 700
Washington DC 20005
Phone: (202) 377-7975
Email: wayne.pestone@thomsonreuters.com

DRAFT

Sincerely,



Wayne Pestone
Chief Compliance Officer

cc: Nancy Markowitz, Deputy Director, Division of Market Oversight, Exchange and Data
Repository Branch

Roger Smith, Special Counsel, Division of Market Oversight
(Commodity Futures Trading Commission)

EXHIBIT A
Explanation and Analysis of Material Amendments

Amendment and Explanation	Relevant Law, Regulation or Guidance
<p><u>Non-Deliverable Forward Contract</u></p> <ol style="list-style-type: none"> 1. Contract Overview 2. Reference Currency 3. Trading Conventions 4. Forward Rate 5. Fixing Date 6. Settlement Procedure 7. Description 	<ol style="list-style-type: none"> 1. Clarified that NDFs settle in USD 2. (1) Changed title to refer to “Reference Currency 1 and Reference Currency 2”; (2) Replaced Fixing Reference with settlement procedure set forth in the “Description” below; and (3) Added the following as Reference Currencies: KES (Kenya Shilling); PKR (Pakistan Rupee); THB (Thai Baht); AED (United Arab Emirates Dirham); BGN (Bugaria Lev); BWP (Botswana Pula); CNH (Offshore Chinese Renminbi); EEK (Estonia Kroon); HRK (Croatia Kuna); ISK (Iceland Krona); JMD (Jamaica Dollar); JOD (Jordan Dinar); KWD (Kuwait Dinar); LKR (Sri Lanka Rupee); LVL (Latvia Lats); MAS (Morocco Dirham); MUR (Mauritius Rupee); OMR (Oman Rial); QAR (Qatar Riyal); RSD (Serbia Dollar); SAR (Saudi Arabia Riyal); SKK (Slovakia Koruna); TND (Tunisia Dollar); USD (U.S. Dollar); XOF (West African CFA Franc); and ZWD (Zimbabwe Dollar). 3. Amended to refer to defined term “Notional Amount” 4. Amended Forward Rate to be “The currency exchange rate expressed as the amount of Reference Currency 1 per unit of Reference Currency 2” 5. Amended to refer to the defined term “Forward Rate” 6. Amended to refer to defined term “Settlement Currency” 7. Added a narrative description of the method for determining the Spot FX Rate

EXHIBIT B
Amended Contract Specifications (Clean)

NDF Contract Terms	
Contract Overview	A non-deliverable forward (NDF) is an outright forward contract in which counterparties settle the difference between the contracted NDF price or rate and the prevailing spot price or rate on an agreed notional amount, and where settlement is performed in USD.
Reference Currency 1 & Reference Currency 2	<p>Non Deliverable Currencies</p> <ul style="list-style-type: none"> ARS Argentine Peso BRL Brazilian Real CLP Chilean Peso CNY Chinese Renminbi COP Colombian Peso EGP Egyptian Pound GTQ Guatemalan Quetzal IDR Indonesian Rupiah INR Indian Rupee KES Kenya Shilling KRW South Korean Won KZT Kazakh Tenge MYR Malaysian Ringgit PEN Peruvian Nuevo Sol PHP Philippine Peso PKR Pakistan Rupee RUB Russian Ruble THB Thai Baht TWD Taiwan Dollar UAH Ukrainian Hryvnia UYU Uruguayan Peso VEF Venezuelan Bolívar VND Vietnamese Dong <p>Deliverable Currencies</p> <ul style="list-style-type: none"> AED United Arab Emirates Dirham AUD Australia Dollar BGN Bulgaria Lev BWP Botswana Pula CAD Canada Dollar CHF Switzerland Franc CNH Offshore Chinese Renminbi CZK Czech Republic Koruna DKK Denmark Krone EEK Estonia Kroon EUR Euros

	<p> GBP United Kingdom Pound HKD Hong Kong Dollar HRK Croatia Kuna HUF Hungary Forint ILS Israel Shekel ISK Iceland Krona JMD Jamaica Dollar JOD Jordan Dinar JPY Japan Yen KWD Kuwait Dinar LKR Sri Lanka Rupee LVL Latvia Lats MAS Morocco Dirham MUR Mauritius Rupee MXN Mexico Peso NOK Norway Krone NZD New Zealand Dollar OMR Oman Rial PLN Poland Zloty QAR Qatar Riyal RON Romania New Leu RSD Serbia Dollar SAR Saudi Arabia Riyal SEK Sweden Krona SGD Singapore Dollar SKK Slovakia Koruna TND Tunisia Dollar TRY Turkey Lira USD U.S. Dollar XOF West African CFA Franc ZAR South Africa Rand ZWD Zimbabwe Dollar </p>
Settlement Currency	Non-deliverable forwards (NDFs) settle in USD
Quoting Convention and Minimum Increment	Notional amount, as agreed by the counterparties
Minimum Size	Notional amount, as agreed by the counterparties
Notional Currency	Currency in which the contract size is expressed in
Trading Conventions	Buy or Sell which refers to the contract size expressed in Notional Currency
Forward Rate	The currency exchange rate expressed as the amount of Reference

	Currency 1 per unit of Reference Currency 2
Trade Date	The date on which parties enter into the contract
Settlement Date	Specified settlement or payment date
Fixing Date	The date at which the Forward Rate is calculated
Settlement Procedure	Bilateral settlement performed in the Settlement Currency
Trading Hours	13:00 Sunday - 17:00 Friday Eastern Time
Clearing Venue	Bilateral
Block Size	As set forth in Appendix F to Part 43 of the CFTC Regulations
Speculative Limits	As set forth in CFTC 17 CFR Part 150
Reportable Levels	As set forth in CFTC Regulation 15.03

Spot FX Rate Calculation

For NDFs consisting of a Deliverable and Non-Deliverable Currency as Reference Currencies, the Spot FX Rate will be derived from a combination of (1) the spot rate identified in the relevant EMTA, Inc. (“EMTA”) Template for the applicable Non-Deliverable Currency assuming USD as the Settlement Currency (the “Non-Deliverable Spot Rate”), and (2) the WM/Reuters 4:00 pm Closing Spot Rate for the applicable Deliverable Currency against USD; provided, however, that if the WM/Reuters Closing Spot Rate is quoted in units to a non-USD currency, then the Closing Spot Rate shall be converted to USD in accordance with Section 6 of the WM/Reuters Spot & Forward Rates Methodology Guide, as amended and supplemented from time to time, or any successor thereto. The Non-Deliverable Spot Rate shall incorporate all of the EMTA template terms then in effect as recommended by EMTA or a recognized successor that are applicable to the Non-Deliverable Currency (assuming USD as the Settlement Currency).

For NDFs consisting of two Non-Deliverable Currencies as Reference Currencies, the Spot FX Rate will be derived from a combination of the Non-Deliverable Spot Rate for each of the applicable Non-Deliverable Currencies, assuming USD as the Settlement Currency. The Non-Deliverable Spot Rates shall incorporate all of the EMTA template terms then in effect as recommended by EMTA or a recognized successor that are applicable to the Non-Deliverable Component Pair (assuming USD as the Settlement Currency).

For NDFs consisting of two Deliverable Currencies as Reference Currencies, the Spot FX Rate will be derived from a combination of the WM/Reuters 4:00 pm Closing Spot Rate for both of the applicable Deliverable Currencies against USD; provided, however, that if the WM/Reuters Closing Spot Rate for one or both Deliverable Currencies is quoted in units to a non-USD currency, then the Closing Spot Rate for such currency or currencies shall be converted to USD

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EXHIBIT C
Amended Contract Specifications (Marked)

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Minimum Size	Notional amount, as agreed by the counterparties
Notional Currency	Currency in which the contract size is expressed in
Trading Conventions	Buy or Sell which refers to the contract size expressed in notional <u>Notional</u> currency <u>Currency</u>
Forward Rate	Currency <u>The currency</u> exchange rate expressed as the amount of reference currency <u>Reference Currency 1</u> per unit of non-reference currency <u>Reference</u> <u>Currency 2</u>

Trade Date	The date on which parties enter into the contract
Settlement Date	Specified settlement or payment date
Fixing Date	The date at which the difference between the prevailing market exchange rate and the agreed upon exchange rate <u>Forward Rate</u> is calculated
Settlement Procedure	Bilateral settlement performed in the settlement <u>Settlement</u> currency <u>Currency</u>
Trading Hours	13:00 Sunday - 17:00 Friday Eastern Time
Clearing Venue	Bilateral
Block Size	As set forth in Appendix F to Part 43 of the CFTC Regulations
Speculative Limits	As set forth in CFTC 17 CFR Part 151 <u>150</u>
Reportable Levels	As set forth in CFTC Regulation 15.03

Spot FX Rate Calculation

For NDFs consisting of a Deliverable and Non-Deliverable Currency as Reference Currencies, the Spot FX Rate will be derived from a combination of (1) the spot rate identified in the relevant EMTA, Inc. (“EMTA”) Template for the applicable Non-Deliverable Currency assuming USD as the Settlement Currency (the “Non-Deliverable Spot Rate”), and (2) the WM/Reuters 4:00 pm Closing Spot Rate for the applicable Deliverable Currency against USD; provided, however, that if the WM/Reuters Closing Spot Rate is quoted in units to a non-USD currency, then the Closing Spot Rate shall be converted to USD in accordance with Section 6 of the WM/Reuters Spot & Forward Rates Methodology Guide, as amended and supplemented from time to time, or any successor thereto. The Non-Deliverable Spot Rate shall incorporate all of the EMTA template terms then in effect as recommended by EMTA or a recognized successor that are applicable to the Non-Deliverable Currency (assuming USD as the Settlement Currency).

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