



TRADITION SEF, Inc.

Scot J. Halvorsen
Senior Regulatory Counsel and Secretary
Legal Department

May 10, 2018

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 40.2(a) Rule Certification.
Notice of Product Certification of Tradition SEF's
Interest Rate Swap Asset Class.
Tradition SEF Submission No. 2018-02.**

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 U.S. Dollar Interest Rate Swap Product Listing (the "Product Listing"). This Product Listing replaces and supersedes Tradition SEF's previous Product Listing. The product certified by this submission is SOFR OIS. Amendments to the prior version of the Product Listing are reflected in redline on attached Appendices A and B. The effective listing date is May 14, 2018.

The following items are included in this product certification submission:

Appendix A, "General Information," which includes:

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.
4. Product List, including Table 1, which identifies those swaps that will be cleared by a derivatives clearing organization.
5. General specifications and definitions.

Appendix B, "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. 2018-02 in any related correspondence.

Sincerely,

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

Attachments: Appendices A and B

Appendices A and B