December 12, 2019

**VIA ELECTRONIC PORTAL**

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) Product Certification.**

**Notice of Product Certification of Tradition SEF’s**

**Equity Asset Classes- MSCI® USA Index**

**Tradition SEF Submission No. 2019-05**

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 revised Equity Product Listings (the “Product Listings”). The effective listing date for the Product Listings is December 16, 2019.

The product being certified in the Equity Product Listing is the MSCI® USA Index. Amendments to the prior versions of the Product Listings are reflected in redline on attached Appendix A, (which also includes redline changes to reflect additional product certifications that will be filed separately and concurrent with this submission). The attached Product Listings replace and supersede Tradition SEF’s previous Product Listings.

The following items are included in this product certification submission:

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, if applicable.

4. Product lists.

5. General specifications and definitions.

6. 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 products listed in this submission adhere 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 [daniel.glatter@tradition.com](mailto:daniel.glatter@tradition.com). Please reference Tradition SEF Submission No. 2019-05 in any related correspondence.

Sincerely,

/s/ Daniel Glatter

General Counsel and Secretary

Attachments: Appendix A

**Appendix A**