

December 16, 2020

**Submitted via CFTC Portal**

Mr. Christopher J. Kirkpatrick  
Office of the Secretariat  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, D.C. 20581

Re: iSwap Euro B.V. – Rulebook Amendment and Product Filing

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c) of the Commodity Exchange Act (the “Act”) and Sections 40.2(a), 40.2(d), and 40.6(a) of the regulations of the Commodity Futures Trading Commission (the “Commission”), iSwap Euro B.V. (“iSwap”) hereby submits a notification regarding products listed for trading and amendments to its Rulebook related to the above-captioned Rules.

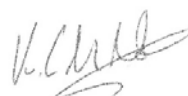
The iSwap SEF commenced operations pursuant to the CFTC Order of Registration on December 10, 2020 and iSwap SEF intends to launch SEF trading on or about January 4, 2021. For the avoidance of doubt, iSwap submitted its product specifications as a part of its SEF application and with this filing, which includes a Product Appendix in Attachment A, such products have been self-certified pursuant to CFTC Regulation 40.2(a) and 40.2(d).

The Rulebook has been amended to make conforming edits and reflect a new definition of Business Day whereby Legal Holidays are holidays that are both United Kingdom Public Holidays and European Union TARGET Holidays. The amendments will become effective on December 31, 2020, no fewer than ten business days from the date hereof. In connection with this submission, iSwap SEF hereby notifies the Commission that:

1. iSwap SEF certifies that it has posted a notice of this pending certification with the Commission and a copy of this submission on iSwap SEF’s website, including an updated version of the Rulebook, a redline of the updates to the Rulebook, and a Product Appendix, which are attached hereto as Attachment A;
2. iSwap SEF certifies that the Rules comply with the Act and the Commission’s regulations thereunder; and
3. No substantive opposing views with respect to the Rules were expressed to iSwap SEF by its governing board or committee members, members of iSwap SEF or market participants.

Should you have questions regarding this submission, please contact the undersigned at +44 20 7000 5184 or at [kieron.nolan@icap.com](mailto:kieron.nolan@icap.com).

Very truly yours,



Kieron Nolan, CEO, iSwap Euro B.V.

**ATTACHMENT A**

Updated Version of Rulebook

Redline of Rulebook

Product Appendix