

December 21, 2022

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: TW SEF LLC – Amendment of Rule 901 (Swap Specifications)

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c) of the Commodity Exchange Act (the “Act”) and Section 40.6(a) of the regulations of the Commodity Futures Trading Commission (the “Commission”), TW SEF LLC (“TW SEF”) hereby submits an amendment to its Rulebook related to the above-captioned Rule. Specifically, the Rulebook has been amended as detailed below.

The Rulebook has been amended to reflect the inclusion of more granular and specific information in the Swap Specifications for the following;

Interest Rate Swaps- Fixed to Floating

Interest Rate Swaps- Basis

Overnight Index Swaps- Fixed-to-Floating

Option Fixed-to Floating Swap Contract (“Swaption”)

Zero Coupon Inflation Swaps- Fixed-to-Floating

Credit Default Swaps - Asia Untranching CDS Indices

In connection with this submission, TW SEF hereby notifies the Commission that:


1. TW SEF certifies that it has posted a notice of this pending certification with the Commission and a copy of this submission on TW SEF’s website, including a redline of Rule 901, which is attached hereto as Attachment A, and a copy of Rule 901, which is attached hereto as Attachment B;
2. TW 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 TW SEF by its governing board or committee members, members of TW SEF or market participants.

Mr. Christopher J. Kirkpatrick
Commodity Futures Trading Commission
December 21, 2022

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Should you have questions regarding this submission, please contact the undersigned at (646) 767-4923 or by email at Devi.Shanmugham@tradeweb.com.

Very truly yours,



Devi Shanmugham
TW SEF CCO

Mr. Christopher J. Kirkpatrick
Commodity Futures Trading Commission
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Attachment A

Redline Version of Rule 901

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Attachment B

Amended Rule 901