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December 18, 2025

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 - Rule Changes - Fully Integrated API Services Fee Schedule (Rate Swaps- Euro and Asia Hours Only)

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"), Tradeweb SEF LLC ("TW SEF") hereby submits amendments to its Fully Integrated API Services Fee Schedule (Rate Swaps - Euro and Asia Hours Only) which have been amended to reflect updates to certain terms. The amendments will become effective on March 7, 2026, no fewer than ten business days from the date hereof. Pursuant to Commission Regulations 40.8 and 145.9(d), attached as Appendix A is the update to the Fully Integrated API Services Fee Schedule (Rate Swaps- Euro and Asia Hours Only) with the additions and deletions indicated in redline format. In connection with this submission, TW SEF hereby notifies the Commission that:

1. Pursuant to CFTC Regulations 40.8 and 145.9, TW SEF is seeking to keep certain information confidential because it would otherwise reveal trade secrets or confidential commercial or financial information and has posted a notice of pending certification with the Commission and a redacted copy of this submission on TW SEF's website.
2. TW SEF certifies that the Rule complies with the Act and the Commission's regulations thereunder, including Core Principle 2 (Compliance with rules), as the Fully Integrated API Services Fee Schedule (Rate Swaps- Euro and Asia Hours Only) is a rule of the SEF; and
3. No substantive opposing views with respect to the Rule were expressed to TW SEF by its governing board or committee members, members of TW SEF or market participants.

If you have any questions, please do not hesitate to contact the undersigned at (646) 767-4923 or by email at Devi.Shanmugham@tradeweb.com.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Devi Shanmugham".

Devi Shanmugham
Chief Compliance Officer
TW SEF

APPENDIX A

Fully Integrated API Services Fee Schedule (Rate Swaps- Euro and Asia Hours Only)

(Blackline and Clean Copies)

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