

February 2, 2021

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: DW SEF LLC – Rulebook Amendments Related to SEF Rule

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”), DW SEF LLC (“DW SEF”) hereby submits amendments to its Rulebook related to the recently adopted *Swap Execution Facility Requirements* (85 FR 82313 (November 18, 2020)) (the “SEF Rule”). The Rulebook has been amended to reflect updates to the CFTC’s Parts 36 and 37 regulations relating to the execution of “package transactions” on swap execution facilities (SEFs) and the resolution of error trades on SEFs as directed by the SEF Rule. The amendment will become effective on February 16, 2021, no fewer than ten business days from the date hereof. In connection with this submission, DW SEF hereby notifies the Commission that:

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

Should you have questions regarding this submission, please contact the undersigned at (646) 560-7223 or at Gregory.compa@tradeweb.com.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Gregory Compa". The signature is fluid and cursive, with the first name "Gregory" being more prominent than the last name "Compa".

Gregory Compa
Chief Compliance Officer

cc: Dorothy D. DeWitt, Division of Market Oversight

ATTACHMENT A

Redline Version of Rule 419

ATTACHMENT B

Newly Adopted Rule 419