



July 18, 2025

Submitted Via SEC Electronic Form Filing System (EFTS)

U.S. Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549

RE: Tradition SEF, LLC - SEC Submission 2025-02 Notification of Amendments to Tradition SEF, LLC Fee Schedule related to Security-Based Swap Transactions

To Whom It May Concern:

Pursuant to Section 3D of the Securities Exchange Act (the “Act”) and Section 242.807(a) of the regulations of the Securities and Exchange Commission (“SEC” or “Commission”), Tradition SEF, LLC, (“TSEF”) is certifying to the Commission the amendment of its fee schedule related to Security-Based Swap (“SB-Swap”) transactions on Tradition SEF, as detailed in the table below (collectively the “**Fee Schedule Amendment**”).

The Fee Schedule Amendment is effective on August 1, 2025.

Exhibit A identifies specific Rule modifications and related compliance with the SBSEF core principles (“**Core Principles**”) as set forth in section 3D of the Securities Exchange Act of 1934 (“SEA”) and the regulations promulgated thereunder in Regulation SE – “Registration and Regulation of Security-Based Swap Execution Facilities” of the Commission’s regulations. TSEF hereby certifies that the Fee Schedule Amendment complies with Section 3D of the SEA, including the core principles relating to security-based swap execution facilities and the SEC rules thereunder as contained in SEC Regulation SE. There were no substantive opposing views expressed to the Fee Schedule Amendment.

Exhibit B provides the amendment to the Fee Schedule in redline format.

Should you require additional information related to this submission, please contact the undersigned at (212) 377-2337 or bennett.kirschner@tradition.com. Please reference Tradition SEF SEC Submission 2025-02 in any related correspondence.

Sincerely,

Bennett Kirschner
General Counsel and Secretary

Att.

Exhibit A (Amendments to Fee Schedule Related to Security-Based Swap Transactions)

Exhibit B (Redacted Fee Schedule Related to Security-Based Swap Transactions - Confidential Treatment Requested)

EXHIBIT A

Amendments to Fee Schedule Related to Security-Based Swap Transactions

| Rule | Change | Explanation and Analysis of the operation, purpose, and effect of the proposed rule or rule amendment and its compliance with applicable provisions of the Securities Exchange Act, including core principles, and the Commission's regulations thereunder. |
|---------------------|---|---|
| Fee Schedule | <p>The Fee Schedule related to security-based swap transactions has been amended to reflect revisions to the following fees:</p> <ol style="list-style-type: none"> 1. Application & Connections Fees, section (i) removed the one-time Administrative and Surveillance Fee for Broker Firm Participant category. 2. Application & Connection Fees, section (iv) amended monthly access fees for single name equity swaps, equity customer basket swaps and all equity SB Swap products. 3. Trade Processing Fees, section (i) amended transaction fees for single name equity swaps and equity custom basket swaps. 4. Trade Processing Fees, section (ii) removed transaction fees. | <p>Tradition SEF's changes to the standardized fee schedule related to security-based swap transactions demonstrates Tradition SEF's adherence to open access principles. Accordingly, Tradition SEF is promoting a fair, transparent platform.</p> <p>In the lead up to SBSEF registration Tradition SEF made educated guesses in the areas of (1) costs associated with running an SBSEF in parallel to its existing SEF and (2) liquidity characteristics of the qualifying SB Swap market segments e.g. number of participants, trade volumes etc.</p> <p>Having a few months of SBSEF business operations behind us and now having "real-world" experience and knowledge of these aforementioned areas, Tradition SEF is in a better position to judge the economics of the SBSEF business.</p> <p>As such Tradition SEF has proposed the following changes:</p> <p style="text-align: center;">REDACTED</p> <p>Tradition SEF has applied the above fee schedule changes to all Participants. As such, any participant qualifying as a Broker Firm Participant will have the same trade processing fees applied, meeting the fair and non-discriminatory access requirements.</p> |

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| | | <p>The proposed changes to the fee schedule comply with Core Principle 2 (Compliance with Rules) and specifically with Rule 819(c)(1)(iii) of Regulation SE, which requires “comparable fee structures for eligible contract participants and independent software vendors receiving comparable access to, or services from, the security-based swap execution facility.” While Tradition SEF’s rule change alters fee amounts, the fee structures themselves remain comparable and non-discriminatory. All Broker Firm Participants, regardless of size and/or affiliation with competing SEFs, are subject to monthly access fee and a per transaction fee.</p> <p>Further, the Core Principles make no stipulations regarding the size of the fees, only the structure. Given that Tradition SEF’s current fee structure, which already contains specific fees for each category of broker firm participants complies with the Core Principles, an amendment to fee amounts is in line with the Core Principles.</p> <p>Core Principle 2 and Section 3D(d)(2) of the SEA also requires an SBSEF to establish and enforce compliance with any rule that is established by the SBSEF. Rule 819(c) of Regulation SE also requires a SEF to require that an eligible contract participant (“ECP”) consent to its jurisdiction before the ECP can access the SEF. The proposed amendment makes no change regarding compliance enforcement or consent, and thus is consistent with Core Principle 2.</p> <p>By complying with Core Principle 2, Tradition SEF demonstrates its compliance with Core Principle 1 (Compliance with Core Principles) and 15 U.S.C. § 78c-4, which requires that a security-based swap execution</p> |
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| | | facility comply with any requirement that the SEC may impose by rule or regulation. |
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EXHIBIT B

Redacted Fee Schedule Related to Security-Based Swap Transactions – Confidential Treatment Requested



TRADITION SEF, LLC

CONFIDENTIAL TREATMENT REQUESTED BY TRADITION SEF, LLC

32 Old Slip, 28th Floor
New York, NY, 10005
Tel: +1-212-791-4500
Email: tradsefOB@tradition.com

Tradition Fee Schedule – Security-Based Swaps - Effective Date: 8/1/2025

Notes Associated with Fee Schedule

Any Fees associated with activity on and interaction with Tradition SEF systems may be changed from time to time at the sole discretion of Tradition SEF.

Any modifications to this Fee Schedule will be notified to Participants via a Participant Notification, a copy of which will be made available to authorized participants upon a request via email taa.TradSEF@tradition.com

Note: Tradition SEF has requested confidential treatment of this Fee Schedule pursuant to the Freedom of Information Act. Distribution of this Fee Schedule, in whole or in part, outside of a client of Tradition SEF's organization is strictly prohibited.

REDACTED

EXHIBIT B IS SUBJECT TO A REQUEST FOR CONFIDENTIAL TREATMENT