



TRADE VAULT

March 10, 2021

VIA ELECTRONIC CORRESPONDENCE

Christian Sabella
Deputy Director
Office of Clearance and Settlement
Division of Trading and Markets
U.S. Securities and Exchange Commission
100 F Street NE
Washington, DC 20549

Re: ICE Trade Vault, LLC Application for Registration as a Security-Based Swap Data Repository

Dear Mr. Sabella:

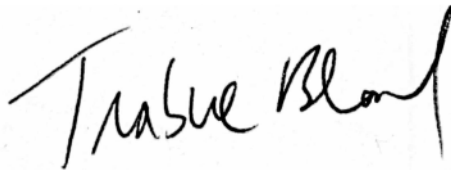
ICE Trade Vault, LLC ("ICE Trade Vault") hereby submits an Application for Registration as a Security-Based Swap Data Repository ("Form SDR") along with accompanying exhibits ("Exhibits," and together with Form SDR, this application letter and any other appendices or documentation enclosed herewith, the "Submission"). ICE Trade Vault is providing the Submission to the U.S. Securities and Exchange Commission ("SEC" or "Commission") staff ("Staff") pursuant to Rule 13n-1 (17 C.F.R. § 240.13n-1) under the Securities Exchange Act of 1934, as amended ("Exchange Act").

ICE Trade Vault is a provisionally registered swap data repository regulated by the Commodity Futures Trading Commission ("CFTC"). In this capacity, ICE Trade Vault has been accepting derivatives data for the commodity and credit asset (broad-based credit indices) classes in the United States since 2012. In 2015, the CFTC approved ICE Trade Vault to accept data in the interest rate and foreign exchange asset classes. ICE Trade Vault is in compliance with applicable requirements under the CFTC swap reporting rules and satisfies the standard for Commission registration of an SBSDR under Exchange Act Rule 13n-1(c). Additionally, in 2014, the Ontario Securities Commission, the Autorité des marchés financiers and the Manitoba Securities Commission approved ICE Trade Vault as a Canadian Trade Repository to serve the commodity, credit and foreign exchange asset classes and in 2016 ICE Trade Vault was approved to serve the interest rate asset class. ICE Trade Vault received the same approval in 2016 from the Alberta Securities Commission, British Columbia Securities Commission, Financial and Consumer Affairs Authority of Saskatchewan, Financial and Consumer Services Commission (New Brunswick), Yukon Government, Superintendent of Securities, Government of Northwest Territories, Superintendent of Securities, Department of Justice, Government of Prince Edward Island, Superintendent of Securities, Corporate and Insurance Services Division, Government of Nunavut Superintendent of Securities, Department of Justice and Nova Scotia Securities Commission to serve the commodity, credit, interest rate and foreign exchange asset classes. Lastly, ICE Trade Vault received the same approval in 2019 from the Superintendent of Securities, Newfoundland and Labrador.

ICE Trade Vault seeks to operate a security-based swap data repository (“SBSDR”) for the collection, storage and regulatory reporting of a comprehensive range of trade data in respect of transactions in security-based swaps. ICE Trade Vault intends to seek approval by the SEC to offer its SBSDR service to Users, as defined under Exchange Act Rule 900(u)(1)-(3). With respect to any security-based swap asset class(es) for which ICE Trade Vault will accept transaction information, ICE Trade Vault intends to rely on its registration as a swap data repository with the CFTC for the time-limited relief period set forth in the Cross-Border Application of Certain Security-Based Swap Requirements (Part X.C and Part X.D).

ICE Trade Vault appreciates your continued attention to the Submission.

Very truly yours,



Trabue Bland
President, ICE Trade Vault, LLC

cc: Kara Dutta, General Counsel, ICE Trade Vault
Melissa Ratnala, Chief Operating Officer, ICE Trade Vault
Joseph Tramontana, Chief Compliance Officer, ICE Trade Vault