

Via CFTC Portal

March 20, 2020

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: Commission Regulations 40.6(a)(6): Emergency Self-Certification of Market Regulation
Advisory Notice (COVID-19 Emergency Notice)

Dear Mr. Kirkpatrick:

TW SEF LLC (“TW SEF”) hereby notifies the Commodity Futures Trading Commission (the “Commission”), pursuant to Section 5c(c) of the Commodity Exchange Act (the “Act”) and Commission Regulation 40.6(a)(6)(ii), that it is self-certifying a Market Regulation Advisory Notice entitled COVID-19 Emergency Notice (the “COVID-19 Notice”).

The COVID-19 Notice is an Emergency Rule and will be effective on March 20, 2020. The COVID-19 Notice was implemented under TW SEF Rule 412 (Emergencies) and its issuance was approved by the Board of TW SEF.

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

1. TW SEF certifies that it has posted the COVID-19 Notice on TW SEF’s website and has provided this notification to the Commission;
2. TW SEF certifies that the COVID-19 Notice complies with the TW SEF Rulebook, the Act and the Commission’s regulations, thereunder, specifically Core Principle 8 (Emergency Authority); and
3. No substantive opposing views with respect to the COVID-19 Notice were expressed to TW SEF by its governing board or committee members, or market participants.

This submission letter contains the following attachments:

Attached as Exhibit A is the COVID-19 Notice, which provides a concise explanation and analysis of the operation, purpose, and effect of the emergency rule and its compliance with applicable provisions of the Act, including core principles, and the Commission’s regulations thereunder.

Mr. Christopher J. Kirkpatrick
Commodity Futures Trading Commission
March 20, 2020

In the event that you have questions, please contact the undersigned at (646) 560-7223 or 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" and last name "Compa" clearly distinguishable.

Gregory Compa
Chief Compliance Officer
TW SEF LLC

Mr. Christopher J. Kirkpatrick
Commodity Futures Trading Commission
March 20, 2020

EXHIBIT A

TW SEF COVID-19 EMERGENCY NOTICE