March 20, 2024

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 – Amendment of Rule 901 (Swap Specifications)

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 an amendment to its Rulebook related to the above-captioned Rule. Specifically, the Rulebook has been amended as detailed below.

The Rulebook has been amended to reflect the delisting of Single Period Swaps: US Dollar Secured Overnight Financing Rate. The amendment will become effective on March 20, 2024.

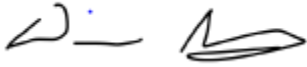In connection with this submission, DW SEF hereby notifies the Commission that:

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 Rule 901, which is attached hereto as Exhibit A, and a copy of Rule 901, which is attached hereto as Exhibit B;

2. DW SEF certifies that the Rule complies with the Act and the Commission's regulations thereunder; and

3. No substantive opposing views with respect to the Rule 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) 767-4923 or by email at Devi.Shanmugham@tradeweb.com.

Mr. Christopher J. Kirkpatrick
Commodity Futures Trading Commission
March 20, 2024

Very truly yours,

Devi Shanmugham
DW SEF CCO

Exhibit A

Redline Version of Rule 901

(d)   Single Period Swaps: US Dollar Secured Overnight Financing Rate

Contract Description	A Single-Period Interest Rate Swap referencing the Secured Overnight Financing Rate (SOFR) is a forward-starting Fixed-vs.-Floating Interest-Rate Swap, with a single floating-rate period. One party buys (pays) a fixed interest rate and receives compounded SOFR and one party sells (receives) a fixed interest rate and pays compounded SOFR. A net payment is made on the Maturity Date.
Currency and Floating Rate Index – Time Period	USD – Secured Overnight Financing Rate
Contract Size	As agreed by parties.
Minimum Size	As agreed by parties.
Effective Date / Start Date	The first date from which fixed and floating interest amounts accrue.
Maturity Date / End Date	The final date until which fixed and floating interest amounts accrue.
Tenor / Duration	1 Month, 3 Month, 6 Month
Notional	Fixed Notional
Trade Start Types	• Spot Starting (T+2) • IMM Start Date (September, December, March, June) • Forward Start Date
Fixing Date	SOFR fixing date is two good business days prior to the effective date
Business Day Conventions	Modified Following
Holiday Calendar(s)	US Government Securities Calendar
Fixed Leg	• Payment Frequency: One Time • Day Count Convention: Actual/360
Floating Leg	• Payment Frequency: One Time • Day Count Convention: Actual/360
Periodic Settlement: Payment and Resets	• Fixed Leg: The payment amount of the Fixed Leg is based on the following: Notional, Payment Frequency, Day Count Convention and Fixed Interest Rate. • Floating Leg: The payment amount of the Floating Leg is based on the following: Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index and Floating Reset Dates. Payments are settled in accordance with the payment frequency of the swap.
Fixed Rate Type	Par
Optionality	No
Dual Currencies	No
Settlement Procedure	As determined by the DCO.
Trading Hours	Trading hours of DW SEF.

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~~DCO(s)~~	~~LCH and CME~~
~~Block Size~~	~~See Rule 411 and CFTC Regulation Part 43, Appendix F.~~
~~Reportable Levels~~	~~See Rule 409 and CFTC Regulation 15.03.~~
~~Position Limits~~	~~See Rule 408 and CFTC Regulation Part 150.~~
~~Reporting~~	~~All trades reported to SDR in accordance with CFTC requirements.~~

Exhibit B

Amended Rule 901

(a)   Overnight Index Swaps: US Dollar Federal Funds Effective Rate

Contract Description	An Overnight Index Swap referencing the US Dollar Federal Funds Effective Rate is an agreement between two parties to exchange a fixed interest payment for a floating interest payment based on the compounded rate of the Federal Funds Effective Rate over every day of the payment period.	
Currency and Floating Rate Index	USD	Federal Funds Effective Rate, per H-15
Contract Size	As agreed by parties.	
Minimum Size	As agreed by parties.	
Effective Date / Start Date	The date on which parties begin calculating accrued obligations such as fixed and floating interest rate payments.	
Stated Maturity Range / Maturity Date	7 days to 30 years | The final date on which the obligations no longer accrue and the final payment occurs.	
Trade Start Types	- Spot Starting (T+2) - Forward Starting (starting on next Federal Reserve Announcement Date)	
Fixed Leg	- Payment Frequency: Term and Annual - Day Count Convention: Actual/360	
Floating Leg	- Term and Annual - Day Count Convention: Actual/360	
Notional	Fixed Notional	
Holiday Calendar(s)	Federal Reserve	
Business Day Conventions	Modified Following	
Periodic Settlement: Payment and Resets	- Fixed Leg: The payment amount of the Fixed Leg is based on the following: Notional, Payment Frequency, Day Count Convention and Fixed Interest Rate. - Floating Leg: The payment amount of the Floating Leg is based on the following: Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index and Floating Reset Dates. Payments are settled in accordance with the payment frequency of the swap.	
Optionality	No	
Dual Currencies	No	
Settlement Procedure	As determined by the DCO.	

Trading Hours	Trading hours of DW SEF.
DCO(s)	LCH and CME
Block Size	*See* Rule 411 and CFTC Regulation Part 43, Appendix F.
Reportable Levels	*See* Rule 409 and CFTC Regulation 15.03.
Position Limits	*See* Rule 408 and CFTC Regulation Part 150.
Reporting	All trades reported to SDR in accordance with CFTC requirements.

(b)   Overnight Index Swaps: US Dollar Secured Overnight Financing Rate

Contract Description	An Overnight Index Swap referencing the Secured Overnight Financing Rate (SOFR) is an agreement between two parties to exchange a fixed interest payment for a floating interest payment based on the compounded rate of SOFR over every day of the payment period.	
Currency and Floating Rate Index	USD	Secured Overnight Financing Rate
Contract Size	As agreed by parties.	
Minimum Size	As agreed by parties.	
Effective Date / Start Date	The date on which parties begin calculating accrued obligations such as fixed and floating interest rate payments.	
Stated Maturity Range / Maturity Date	2 days to 50 years | The final date on which the obligations no longer accrue and the final payment occurs.	
Trade Start Types	- Spot Starting (T+2) - Trade Date Starting (T +0) - Forward Starting (starting on next Federal Reserve Announcement Date) - IMM Start Date (September, December, March, June).	
Fixed Leg	- Payment Frequency: Term, Annual, Quarterly - Day Count Convention: Actual/360	
Transaction Types	- Outright - Spread vs. US Treasury Securities ("Swap Spread" or "Spreadover") - Rate Switch - Spread Switch - Butterfly	
Floating Leg	- Term, Annual, Quarterly - Day Count Convention: Actual/360	
Notional	Fixed Notional	
Holiday Calendar(s)	US Government Securities Calendar	
Business Day Conventions	Modified Following	
Periodic Settlement: Payment and Resets	- Fixed Leg: The payment amount of the Fixed Leg is based on the following: Notional, Payment Frequency, Day Count Convention and Fixed Interest Rate. - Floating Leg: The payment amount of the Floating Leg is based on the following: Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index and Floating Reset Dates. Payments are settled in accordance with the payment frequency of the swap.	
Optionality	No	

Dual Currencies	No
Settlement Procedure	As determined by the DCO.
Trading Hours	Trading hours of DW SEF.
DCO(s)	LCH and CME
Block Size	*See* Rule 411 and CFTC Regulation Part 43, Appendix F.
Reportable Levels	*See* Rule 409 and CFTC Regulation 15.03.
Position Limits	*See* Rule 408 and CFTC Regulation Part 150.
Reporting	All trades reported to SDR in accordance with CFTC requirements.

(c)   Overnight Index Swaps: Canadian (Dollar) Overnight Repo Rate Average

Contract Description	An Overnight Index Swap referencing the Canadian Overnight Repo Rate Average (CORRA) is an agreement between two parties to exchange a fixed interest payment for a floating interest payment based on the geometric average of CORRA over every day of the payment period.	
Currency and Floating Rate Index	CAD	Canadian Overnight Repo Rate Average (CORRA)
Contract Size	As agreed by parties.	
Minimum Size	As agreed by parties.	
Effective Date / Start Date	The date on which parties begin calculating accrued obligations such as fixed and floating interest rate payments.	
Stated Maturity Range / Maturity Date	7 days to 30 years | The final date on which the obligations no longer accrue and the final payment occurs.	
Trade Start Types	• Spot Starting (T+0) • Forward Starting	
Fixed Leg	• Payment Frequency: Term and Annual • Day Count Convention: Actual/365	
Floating Leg	• Term and Annual • Day Count Convention: Actual/365	
Notional	Fixed Notional	
Holiday Calendar(s)	Toronto	
Business Day Conventions	Modified Following	
Periodic Settlement: Payment and Resets	• Fixed Leg: The payment amount of the Fixed Leg is based on the following: Notional, Payment Frequency, Day Count Convention and Fixed Interest Rate. • Floating Leg: The payment amount of the Floating Leg is based on the following: Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index and Floating Reset Dates. Payments are settled in accordance with the payment frequency of the swap.	
Optionality	No	
Dual Currencies	No	
Settlement Procedure	As determined by the DCO.	

Trading Hours	Trading hours of DW SEF.
DCO(s)	LCH and CME
Block Size	*See* Rule 411 and CFTC Regulation Part 43, Appendix F.
Reportable Levels	*See* Rule 409 and CFTC Regulation 15.03.
Position Limits	*See* Rule 408 and CFTC Regulation Part 150.
Reporting	All trades reported to SDR in accordance with CFTC requirements.

(d)   Basis Swaps: USD SOFR vs. USD Federal Funds Effective Rate Basis Swap

Contract Description	A SOFR vs. Federal Funds Effective Rate Basis Swap is an agreement between two Parties A and B, whereby Party A pays Party B compounded SOFR plus an agreed Spread, on an agreed Notional, every three months over the Tenor of the Swap. In exchange, Party B pays Party A compounded Fed Funds Effective Rate, on the agreed Notional, every three months, over the Tenor of the Swap.	
Currency and Floating Rate Index - Time Period	Floating Leg 1 (spread adjusted)	USD Secured Overnight Financing Rate (SOFR)
	Floating Leg 2	USD Federal Funds Effective, per H-15
Contract Size	As agreed by the parties.	
Minimum Size	As agreed by the parties.	
Effective Date / Start Date	As agreed by the parties.	
Stated Maturity Range / Maturity Date	3 months to 51 years	The final date on which the obligations no longer accrue and the final payment occurs.	
First Fixing Date	• The First SOFR fixing date is the Start Date of the Swap • The first Federal Funds Fixing Date is the Start Date of the Swap	
Trade Start Types	• Spot and Forward-Starting	
Notional	Fixed Notional	
Holiday Calendar	NY/ US Government Securities Calendar	
Business Day Conventions	Modified Following	
Floating Leg 1: SOFR	• Payment Frequency: Compounded and Paid Quarterly • Day Count Convention: Actual/360	
Floating Leg 2: FFe	• Payment Frequency: Compounded and Paid Quarterly • Day Count Convention: Actual/360	
Periodic Settlement: Payment and Resets	• Floating Leg 1: The payment amount of the Floating Leg 1 is based on the following: Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index, and Floating Reset Dates. • Floating Leg 2: The payment amount of the Floating Leg 2 is based on the following: Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index and Floating Reset Dates. Payments are settled in accordance with the payment frequency of the swap.	
Optionality	No	

Dual Currencies	No
Settlement Procedure	As determined by the DCO.
Trading Hours	Trading hours of DW SEF.
DCO(s)	LCH.Clearnet Limited ("LCH") and Chicago Mercantile Exchange Inc. ("CME").
Block Size	*See* Rule 411 and CFTC Regulation Part 43, Appendix F.
Reportable Levels	*See* Rule 409 and CFTC Regulation 15.03.
Position Limits	*See* Rule 408 and CFTC Regulation Part 150.
Reporting	All trades reported to SDR in accordance with CFTC requirements.

(e)   Basis Swaps: USD 3-Month BSBY vs. 1-Month BSBY

Contract Description	A 3-Month BSBY vs. 1-Month BSBY Basis Swap is an agreement between two Parties A and B, whereby Party A pays Party B compounded 1-Month BSBY plus an agreed Spread, on an agreed Notional, every three months over the Tenor of the Swap. In exchange, Party B pays Party A 3-Month BSBY every three months, on the agreed Notional, over the Tenor of the Swap.	
Currency and Floating Rate Index - Time Period	Floating Leg 1 (Spread Adjusted)	USD 1-Month Bloomberg Short-Term Bank Yield Index
	Floating Leg 2	USD 3-Month Bloomberg Short-Term Bank Yield Index
Contract Size	As agreed by the parties.	
Minimum Size	As agreed by the parties.	
Effective Date / Start Date	As agreed by the parties.	
Stated Maturity Range / Maturity Date	3 months to 51 years | The final date on which the obligations no longer accrue and the final payment occurs.	
First Fixing Date	• The first BSBY Fixing Date is 2 New York business days prior to the Effective Date.	
Trade Start Types	• Spot Starting (T+2) and Forward Starting	
Notional	Fixed Notional	
Holiday Calendar	NY	
Business Day Conventions	Modified Following	
Floating Leg 1: 1-Month USD BSBY	• Payment Frequency: Compounded and Paid Quarterly • Day Count Convention: Actual/360	
Floating Leg 2: 3-Month USD BSBY	• Payment Frequency: Quarterly • Day Count Convention: Actual/360	
Periodic Settlement: Payment and Resets	• Floating Leg 1: The payment amount of the Floating Leg 1 is based on the following: Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index, and Floating Reset Dates. • Floating Leg 2: The payment amount of the Floating Leg 2 is based on the following: Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index and Floating Reset Dates. Payments are settled in accordance with the payment frequency of the swap.	
Optionality	No	

Dual Currencies	No
Settlement Procedure	As determined by the DCO.
Trading Hours	Trading hours of DW SEF.
DCO(s)	LCH.Clearnet Limited ("LCH") and Chicago Mercantile Exchange Inc. ("CME").
Block Size	*See* Rule 411 and CFTC Regulation Part 43, Appendix F.
Reportable Levels	*See* Rule 409 and CFTC Regulation 15.03.
Position Limits	*See* Rule 408 and CFTC Regulation Part 150.
Reporting	All trades reported to SDR in accordance with CFTC requirements.

(f)   Basis Swaps: USD SOFR vs. 3-Month BSBY Basis Swap

Contract Description	A USD SOFR vs. 3-Month BSBY Basis Swap is an agreement between two Parties A and B, whereby Party A pays Party B compounded SOFR plus an agreed Spread, on an agreed Notional, every three months over the Tenor of the Swap. In exchange, Party B pays Party A 3-Month BSBY every three months, on the agreed Notional, over the Tenor of the Swap.	
Currency and Floating Rate Index - Time Period	Floating Leg 1 (spread adjusted)	USD Secured Overnight Financing Rate (SOFR)
	Floating Leg 2	USD 3-Month Bloomberg Short-Term Bank Yield Index
Contract Size	As agreed by the parties.	
Minimum Size	As agreed by the parties.	
Effective Date / Start Date	As agreed by the parties.	
Stated Maturity Range / Maturity Date	3 months to 51 years | The final date on which the obligations no longer accrue and the final payment occurs.	
First Fixing Date	• The first SOFR fixing date is the Start Date of the Swap • The first BSBY Fixing Date is 2 New York business days prior to the Effective Date.	
Trade Start Types	• Spot and Forward-Starting	
Notional	Fixed Notional	
Holiday Calendar	NY	
Business Day Conventions	Modified Following	
Floating Leg 1: SOFR	• Payment Frequency: Compounded and Paid Quarterly • Day Count Convention: Actual/360	
Floating Leg 2: 3-Month BSBY	• Payment Frequency: Quarterly (TBD) • Day Count Convention: Actual/360	
Periodic Settlement: Payment and Resets	• Floating Leg 1: The payment amount of the Floating Leg 1 is based on the following: Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index, and Floating Reset Dates. • Floating Leg 2: The payment amount of the Floating Leg 2 is based on the following: Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index and Floating Reset Dates. Payments are settled in accordance with the payment frequency of the swap.	
Optionality	No	

Dual Currencies	No
Settlement Procedure	As determined by the DCO.
Trading Hours	Trading hours of DW SEF.
DCO(s)	LCH and CME
Block Size	*See* Rule 411 and CFTC Regulation Part 43, Appendix F.
Reportable Levels	*See* Rule 409 and CFTC Regulation 15.03.
Position Limits	*See* Rule 408 and CFTC Regulation Part 150.
Reporting	All trades reported to SDR in accordance with CFTC requirements.

(g) Basis Swaps: USD SOFR vs. 1-Month BSBY Basis Swap

Contract Description	A USD SOFR vs. 1-Month BSBY Basis Swap is an agreement between two Parties A and B, whereby Party A pays Party B compounded SOFR plus an agreed Spread, on an agreed Notional, every one month over the Tenor of the Swap. In exchange, Party B pays Party A 1-Month BSBY every month, on the agreed Notional, over the Tenor of the Swap.	
Currency and Floating Rate Index - Time Period	Floating Leg 1 (spread adjusted)	USD Secured Overnight Financing Rate (SOFR)
	Floating Leg 2	USD 1-Month Bloomberg Short-Term Bank Yield Index
Contract Size	As agreed by the parties.	
Minimum Size	As agreed by the parties.	
Effective Date / Start Date	As agreed by the parties.	
Stated Maturity Range / Maturity Date	3 months to 51 years | The final date on which the obligations no longer accrue and the final payment occurs.	
First Fixing Date	• The first SOFR fixing date is the Start Date of the Swap • The first BSBY Fixing Date is 2 New York business days prior to the Effective Date.	
Trade Start Types	• Spot and Forward-Starting	
Notional	Fixed Notional	
Holiday Calendar	NY	
Business Day Conventions	Modified Following	
Floating Leg 1: SOFR	• Payment Frequency: Compounded and Paid monthly • Day Count Convention: Actual/360	
Floating Leg 2: 1-month BSBY	• Payment Frequency: Monthly • Day Count Convention: Actual/360	
Periodic Settlement: Payment and Resets	• Floating Leg 1: The payment amount of the Floating Leg 1 is based on the following: Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index, and Floating Reset Dates. • Floating Leg 2: The payment amount of the Floating Leg 2 is based on the following: Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index and Floating Reset Dates. Payments are settled in accordance with the payment frequency of the swap.	
Optionality	No	

Dual Currencies	No
Settlement Procedure	As determined by the DCO.
Trading Hours	Trading hours of DW SEF.
DCO(s)	LCH and CME
Block Size	*See* Rule 411 and CFTC Regulation Part 43, Appendix F.
Reportable Levels	*See* Rule 409 and CFTC Regulation 15.03.
Position Limits	*See* Rule 408 and CFTC Regulation Part 150.
Reporting	All trades reported to SDR in accordance with CFTC requirements.