

# RTX FINTECH & RESEARCH LLC

Swap Execution Facility

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Christopher J. Kirkpatrick  
Secretary of the Commission  
Commodity Futures Trading Commission

March 7, 2024

## Self-Certification of Rule Amendment Under § 40.6(a): Compliance-Manual Revision

Dear Secretary Kirkpatrick:

RTX Fintech & Research LLC (RTX SEF) intends to implement a change to its compliance manual under 17 CFR § 40.6(a) on March 21, 2024. This compliance manual replaces the compliance manual that RTX SEF implemented on May 1, 2023, which was substantively the same as the one that RTX SEF submitted (on March 20, 2023) as Exhibit O to its SEF application; the changes from the March 20, 2023 version to the May 1, 2023 one were that RTX SEF slightly modified the formatting and added information to the “Document Control Page.”

*Attachment A* contains the amended compliance manual; *Attachment B*, a redline of the amended compliance manual against the May 1, 2023 version; and *Attachment C*, a redline of the May 1, 2023 version against the March 20, 2023 version.

Below is the concise explanation and analysis that the Commission requires under § 40.6(a)(7)(v). This amendment relates to certain conditions under which RTX SEF will provide notice to the Commission about changes to its ownership that may pose potential conflicts of interest, and it contains certain non-substantive changes (e.g., an update to RTX SEF’s address). Its purpose is to ensure that the Commission has timely notice of those potential conflicts of interest. In operation, it will ensure that the RTX SEF provides the Commission notice of the potential conflicts of interest.

The amended compliance manual complies with both the Commodity Exchange Act (Act) and Commission’s regulations. Specifically, it complies with Core Principle 12 (Conflicts of Interest) because it functions as an additional control on potential conflicts of interest.

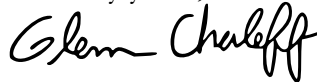
No one has expressed any substantive opposing views to the rule amendment that RTX SEF has not incorporated into the rule.

Finally, on behalf of RTX SEF, I certify the following:

1. RTX SEF has posted on its website a notice of pending certification with the Commission and a copy of this submission (redacted).
2. The amended rule complies with the Act and the Commission's regulations.

If you have any questions about this submission, please contact me.

Sincerely yours,

A handwritten signature in black ink that reads "Glenn Chaleff". The signature is fluid and cursive, with the first name "Glenn" and last name "Chaleff" clearly distinguishable.

Glenn Chaleff

Chief Compliance Officer

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## **Attachment A**

Amended Compliance Manual (New)

CONTENTS INTENTIONALLY LEFT BLANK:

This attachment is subject to a request for confidential treatment.

## **Attachment B**

Redline of Revised Compliance Manual Against Prior Version

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## **Attachment C**

Redline of May 1, 2023 Compliance Manual Against March 20, 2023 Version

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