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Mr. Christopher Kirkpatrick
Secretary of the Commission
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

March 21, 2019

Re: Post-Trade Name Give-Up on Swap Execution Facilities, RIN number 3038-AE79

Dear Mr. Kirkpatrick:

In prior written correspondence to the Commission, in meetings with Former Chairman Massad, members of his staff, and members of the staff of the Division of Market Oversight, and at a public meeting of the Commission's Market Risk Advisory Committee, UBS has consistently voiced its opposition to post-trade name give-up—i.e., the practice by which the identities of the parties to a trade that was anonymous at the time of execution and is intended to be cleared are disclosed to each other after the fact. UBS continues to believe that post-trade name give-up operates as a disincentive to certain market participants to trade on otherwise anonymous limit order book SEFs. Absent a compelling justification, the practice should be ended.

Thank you for your attention.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dylan Roy".

Dylan Roy
Managing Director
Americas Head of Foreign Exchange, Rates and Credit

cc. Mr. Amir Zaidi, Director, Division of Market Oversight
Mr. Aleko Stamoulis, Special Counsel, Division of Market Oversight
Mr. Nhan Nguyen, Special Counsel, Division of Market Oversight