



May 5, 2026

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

REsurety Markets LLC Certification under CFTC Regulation under 40.6(a) for Amendments to Certain Exhibits of Participant Agreement

Dear Mr. Kirkpatrick,

Pursuant to Section 40.6(a) of the regulations of the U.S. Commodity Futures Trading Commission (the "CFTC", or the "Commission"), REsurety Markets LLC ("**REsurety Markets**") hereby notifies the Commission that it has amended its Participant Agreement. The amended Participant Agreement shall become effective May 19, 2026.

The amendment includes (i) the addition of a standardized cover letter to be incorporated into all agreements, and (ii) a revision to Section 2(a) to clarify the applicable effective dates for changes to REsurety Markets' Fee Schedule. Specifically, the revised language distinguishes between (A) changes applicable to existing products or services, which affect fee amounts and become effective thirty (30) days after posting, and (B) changes applicable to new products or services, as well as administrative or clarifying updates that do not modify fee amounts, which become effective ten (10) days after posting.

A concise explanation and analysis of the rules and their compliance with applicable provisions of the Act, including core principles and the Commission's regulations, is attached hereto as Exhibit A. To assist the Commission we have provided redlines of each of the above documents. Confidential treatment is requested in relation to both the revised and redlined versions of the documents.

Please direct any queries regarding this request to Garrett Derbyshire, Chief Compliance Officer, REsurety Markets, at gderbyshire@resurety.com.

Sincerely,

Sinéad Barry-O'Brien

Sinéad Barry-O'Brien
Chief Operating Officer
REsurety Markets, LLC

EXHIBIT A - CORE PRINCIPLE ANALYSIS

The amendments to the Participant Agreement—specifically (i) the clarification of effective dates for Fee Schedule changes and (ii) the inclusion of a standardized cover letter describing REsurety Markets’ role as a CFTC-regulated swap execution facility (“SEF”)—support compliance with multiple Core Principles under the Commodity Exchange Act and Part 37 regulations.

Core Principle 2 – Compliance with Rules

The revised fee provisions enhance transparency and ensure that all market participants are subject to clearly defined, consistently applied fee structures. By distinguishing between (A) fee changes impacting existing products (subject to a 30-day implementation period) and (B) non-pricing or new product-related changes (subject to a 10-day implementation period), the amendment promotes uniform application of fees and prevents disparate treatment.

The inclusion of a standardized cover letter further reinforces REsurety Markets’ obligations as a SEF, including its duty to provide impartial and non-discriminatory access to all Eligible Contract Participants (“ECPs”). Together, these updates ensure that access criteria and economic terms are applied in a fair, transparent, and non-discriminatory manner, consistent with Core Principle 2.

Core Principle 7 – Financial Integrity of Transactions

Clear and predictable fee structures are a component of the overall financial framework governing transactions executed on the SEF. By formalizing the timing and application of fee changes, the amendment reduces the risk of disputes, billing inconsistencies, or retroactive charges that could undermine transaction certainty.

The defined notice periods provide participants with sufficient time to evaluate cost impacts and incorporate them into transaction pricing and credit assessments. This promotes orderly execution and supports the financial integrity and reliability of transactions conducted on the platform.

Core Principle 18 – Recordkeeping

The amendment also strengthens REsurety Markets’ recordkeeping framework by ensuring that all fee-related communications, including the standardized cover letter and posted Fee Schedule updates, are systematically documented and retained.

The use of formalized notice procedures (e.g., internal notification systems and website postings) creates a clear audit trail evidencing (i) when changes were made, (ii) how participants were notified, and (iii) when such changes became effective. This supports compliance with SEF recordkeeping obligations, including the requirement to maintain full, complete, and systematic records of all activities related to the business of the SEF.

EXHIBIT B - PARTICIPANT AGREEMENT

ATTACHED

EXHIBIT C - PARTICIPANT AGREEMENT (REDLINE)

ATTACHED

EXHIBIT D - CONFIDENTIAL TREATMENT REQUEST

ATTACHED