Lee Olesky Chief Executive Officer Tradeweb Markets Inc. 1177 Avenue of the Americas New York, NY 10036

> Re: Tradeweb Markets Inc. Amendment No. 1 to Draft Registration Statement on Form S-1 Submitted December 20, 2018 CIK No. 0001758730

Dear Mr. Olesky:

We have reviewed your amended draft registration statement and have the following

comment. In some of our comments, we may ask you to provide us with information so we may

better understand your disclosure.

Please respond to this letter by providing the requested information and either submitting

an amended draft registration statement or publicly filing your registration statement on

EDGAR. If you do not believe our comment applies to your facts and circumstances or do not

believe an amendment is appropriate, please tell us why in your response.

After reviewing the information you provide in response to this comment and vour

amended draft registration statement or filed registration statement, we may have additional comments.

Draft Registration Statement on Form S-1 Submitted December 20, 2018

Management's Discussion and Analysis of Financial Condition and Results of Operations, page 83

Please refer to comment 2. We note that while you have updated your filing to include

financial statements for the nine months ended September 30, 2018 and 2017, you have

not included a discussion of your financial condition and changes in financial condition

for each period presented. As a result, please revise the Management's Discussion and

Analysis section of your filing as required by Item 303 of Regulation S-K.

You may contact William Schroeder at 202-551-3294 or John Spitz at 202-551-3484 if Lee Olesky Tradeweb Markets Inc. February 5, 2019 Page 2

you have questions regarding comments on the financial statements and related matters. Please contact David Gessert at 202-551-2326 or Pam Long at 202-551-3765 with any other questions.

Sincerely,

FirstName LastNameLee Olesky

Division of

Corporation Finance Comapany NameTradeweb Markets Inc.

Office of Financial

Services February 5, 2019 Page 2 Andrew B. Barkan, Esq. CC: FirstName LastName