

## UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

January 21, 2015

Via E-mail
Richard M. McVey
Chief Executive Officer
MarketAxess Holdings, Inc.
299 Park Avenue
New York, NY 10171

Re: MarketAxess Holdings, Inc.

Form 10-K for the Fiscal Year Ended December 31, 2013

Filed February 24, 2014 File No. 001-34091

Dear Mr. McVey:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Hugh West

Hugh West Accounting Branch Chief