

September 4, 2013

Paul M. Architzel

VIA electronic mail

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PETITION FOR CONFIDENTIAL TREATMENT

Assistant Secretary for FOI, Privacy and Sunshine Acts
 Compliance
 Commodity Futures Trading Commission
 Three Lafayette Center
 1155 21st Street NW
 Washington, DC 20581

RE: Request for Confidential Treatment

Dear Sir or Madam:

BGC Derivatives Market, L.P. (the “Requestor” or BGC) has on this date submitted to the Secretary of the Commission and the Staff of the Division of Market Oversight its application for registration as a Swap Execution Facility pursuant to Part 37 of the Commission’s Regulations. BGC hereby requests that the exhibits to that application described below be afforded confidential treatment in accordance with the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, and CFTC Regulations thereunder, 17 C.F.R. § 145.9, for an indefinite period of time, due to the trade secrets contained in the documents and the sensitive commercial and proprietary nature of the information contained therein, public disclosure of which could be detrimental to the Requestor. As prescribed by 17 C.F.R. § 145.9(d)(4), each page of the documents listed bears the legend, “Confidential Treatment Requested by BGC Derivative Markets, L.P.”

Exhibit	Description	Grounds for Confidential Treatment
A	List of control persons	Confidential commercial information; personal privacy
D-2	List of affiliates, foreign jurisdiction registrations, and addresses for service of process and Organization Chart	Confidential commercial information
E	Qualifications of Facility professional employees	Trade secrets and confidential commercial information
F	Analysis of staffing requirements	Trade secrets and confidential commercial information

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Exhibit	Description	Grounds for Confidential Treatment
H	Brief list of material pending litigation	Confidential commercial and financial information
I, I-1, I-2, I-3	Financial statements; operating expenses and financial resources	Confidential commercial and financial information
J, J-1, J-2	Affiliate financial information	Confidential commercial and financial information
K	Fee schedule	Confidential commercial and financial information
M-2	User Guide	Trade secrets and confidential commercial information
M-3	Technical Manual	Trade secrets and confidential commercial information
M-4	Existing Customer Participant Application	Trade secrets and confidential commercial information
M-5	New Customer Participant Application	Trade secrets and confidential commercial information
N, N-1	Regulatory Services Agreement with NFA	Trade secrets and confidential commercial information
O	Compliance Manual	Trade secrets and confidential commercial information; confidential investigative techniques and procedures
P	Disciplinary and enforcement procedures; alternative dispute resolution	Trade secrets and confidential commercial information; confidential investigative techniques and procedures
Q	Description of trading system	Trade secrets and confidential commercial information
S	Discussion of maintenance of trading	Trade secrets and confidential commercial

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Exhibit	Description	Grounds for Confidential Treatment
	data	information
T	List of clearing organizations and a representation that clearing members will be guaranteeing trades	Confidential commercial information
V, V.01- V.47	Technology questionnaire and attachments numbered 01 through 47 (note that exhibits V.04 and V.08 were intentionally omitted from the set)	Trade secrets and confidential commercial information

In accordance with the regulations above, kindly notify me at the telephone number or email address above of any request under FOIA for access to the described documents, to enable the Requestor to substantiate the grounds for confidential treatment.

Please acknowledge your receipt of this request by date stamping the enclosed extra copy of this letter and returning it in the enclosed self-addressed, postage-paid envelope.

Do not hesitate to contact me if you have any questions regarding this request.

Best regards,



Paul M. Architzel

