

Kieron Nolan Chief Executive Officer

Tel: +44 20 70 00 51 84 Email: kieron.nolan@icap.com

October 23, 2019

Submitted via email: FOIAsubmissions@cftc.gov

Assistant Secretary of the Commission for FOI, Privacy and Sunshine Acts Compliance Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: FOIA Confidential Treatment Request

Dear Assistant Secretary,

iSwap Euro B.V. ("iSwap Euro") hereby requests that the U.S. Commodity Futures Trading Commission (the "Commission") accord confidential treatment under the Freedom of Information Act (the "FOIA") to the attached appendix ("Appendix A") which was submitted to the Commission on this date and relates to the iSwap Euro B.V. Form SEF and accompanying exhibits (the "Application") for registration as a Swap Execution Facility ("SEF") pursuant to Section 5h of the Commodity Exchange Act and Part 37 of the Commodity Futures Trading Commission ("Commission") Regulations. This request pertains to all material set forth in Appendix A, and an additional redacted version of Appendix A is included with this submission. iSwap Euro requests that confidential treatment be afforded as long as the Commission retains Appendix A. In accordance with the Commission's FOIA regulations, Appendix A bears the designation "Confidential Treatment Requested by iSwap Euro B.V.".

This request for confidential treatment under the FOIA is made pursuant to Commission Regulations 40.8 and 145.9(d), as Appendix A contains information that would reveal the trade secrets or confidential commercial or financial information of iSwap Euro and its affiliates. As required by Commission Regulation 40.8(c)(1), iSwap Euro has submitted, together with this request, a detailed written justification in support of the confidentiality of Appendix A.

This request shall not be construed as a waiver of any protection from disclosure or confidential treatment under Commission Regulations or any other protection from disclosure or confidential treatment accorded by law, and iSwap Euro will rely on and invoke any such confidentiality protection with respect to Appendix A. iSwap Euro requests that the Commission advise the undersigned, its representative, in advance of any disclosure of Appendix A pursuant to the FOIA so that this request for confidential treatment may be further substantiated. iSwap Euro further requests that if any of the Confidential Information is to be disclosed to Congress or any other federal or state governmental agency or department, a request for confidential treatment be made by the Commission on iSwap Euro's behalf, or that we be permitted to make such a request directly.



Please contact the undersigned with any questions regarding this matter.

Sincerely,

Kieron Nolan, Chief Executive Officer

iSwap Euro B.V.

Vijzelstraat 68 unit 109

1017 HL Amsterdam (Netherlands)

Enclosed (Appendix A)



APPENDIX A

[REDACTED]