



ICAP SEF (US) LLC  
Harborside Financial Center  
1100 Plaza 5  
Jersey City, NJ 07311

January 5, 2017

**Via Email**

Assistant Secretary of the Commission for  
FOI, Privacy and Sunshine Acts  
Compliance  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, NW  
Washington, D.C. 20581  
Via email: [FOIAsubmissions@cftc.gov](mailto:FOIAsubmissions@cftc.gov)

**Re: FOIA Confidential Treatment Request**

Ladies and Gentlemen:

ICAP SEF (US) LLC (**Applicant**) has submitted to the Commodity Futures Trading Commission (**Commission**) a rule certification in ICAP-2017-R-1 pursuant to CFTC Reg. 40.6 in order to certify its amended Rulebook, including Confidential Chapter 9 (**Certification**). Attached as Exhibit C to the Certification is Confidential Chapter 9 of the Applicant's Rulebook and attached as Exhibit E to the Certification is a marked version of Confidential Chapter 9 of the Applicant's Rulebook showing all changes to the last version submitted to the Commission.

The Applicant hereby requests that Exhibit C and Exhibit E to the Certification (**Confidential Information**) be treated as confidential in order to prevent disclosure of Applicant's trade secrets and confidential commercial and financial information upon a request under the Freedom of Information Act (**FOIA**). We request the Confidential Information be provided confidential treatment for an indefinite period.

Please promptly inform the following of any request for the Confidential Information or its contents made pursuant to FOIA or the Commission's rules so that we may substantiate the foregoing request for confidential treatment in accordance with Section 145.9 of the Commission's Regulations: Attention: General Counsel, ICAP SEF (US) LLC, Harborside 5, 185 Hudson Street, Suite 1200, Jersey City, NJ 07311.

Pursuant to Part 145.9(d)(4) of the Commission's regulations, we have marked each page of the Confidential Information with the words "Confidential Treatment Requested by ICAP SEF (US) LLC" and have identified each portion of the Confidential Information with the following identifying numbers and codes, as applicable: ICAP-2017-R-1 Exhibit C and ICAP-2017-R-1 Exhibit E.

Please contact the undersigned at 212-341-9193 with any questions regarding this matter.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gregory Compa". The signature is fluid and cursive, with the first name "Gregory" written in a larger, more prominent script than the last name "Compa".

Gregory Compa, Chief Compliance Officer  
**ICAP SEF (US) LLC**  
Harborside 5  
185 Hudson Street, Suite 1200  
Jersey City, NJ 07311

Cc by email: Division of Market Oversight, Commodity Futures Trading Commission  
([dmosubmissions@cftc.gov](mailto:dmosubmissions@cftc.gov))