



CFTC FOIA CONFIDENTIAL TREATMENT REQUEST

TO: **CFTC FOIA COMPLIANCE OFFICE**
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

FROM: **THE OPTIONS CLEARING CORPORATION**
Legal Department
125 South Franklin Street, Suite 1200
Chicago, Illinois 60606
(312) 322-6200

BY: Justin Byrne, Executive Director, Associate General Counsel

DATE: 2021-01-22

Pursuant to the Freedom of Information Act and the rules of the U.S. Commodity Futures Trading Commission (“Commission”) implementing FOIA, The Options Clearing Corporation (“OCC”) hereby requests confidential treatment for the record(s) (“Record(s)”) identified below:

RECORD(S) FOR WHICH CONFIDENTIAL TREATMENT IS REQUESTED:

- A one-page document titled, “OCC Data and Supporting Analysis for Proposed Changes,” which is attached to SR-OCC-2020-016 as Exhibit 3.
- A four-page document titled, “Mapping of Margins Methodology to STANS Description,” which is attached to SR-OCC-2020-016 as Exhibit 3A.
- A 214-page document titled, “Margins Methodology,” dated October 2020, which is attached to SR-OCC-2020-016 as Exhibit 3B.
- A 77-page document titled, “System for Theoretical Analysis and Numerical Simulation (STANS) Methodology Description [Annotated],” which is attached to SR-OCC-2020-016 as Exhibit 3C.
- A 77-page document titled, “System for Theoretical Analysis and Numerical Simulation (STANS) Methodology Description,” which is attached to SR-OCC-2020-016 as Exhibit 5A.
- A 214-page document titled, “Margins Methodology,” dated October 2020, which is attached to SR-OCC-2020-016 as Exhibit 5B.
- A 16-page document titled, “Margin Policy,” which is attached to SR-OCC-2020-016 as Exhibit 5C.

BASIS:

- Business confidentiality - The Record(s) contain(s) contain the trade secrets or confidential

commercial or financial information of a self-regulatory organization and are being provided to the Commission's staff in response to a request made pursuant to the Commission's oversight authority. OCC's request for confidential treatment extends to any derivative works (regardless of media) containing the above described Record(s) or otherwise based thereon.

FOIA Notice: 2021-01-22