



ICAP GLOBAL DERIVATIVES LIMITED
2 Broadgate
London
EC2M 7UR
United Kingdom

January 26, 2015

Via Email

Assistant Secretary of the Commission for
FOI, Privacy and Sunshine Acts
Compliance
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, D.C. 20581
Via email: FOIASubmissions@cftc.gov

Re: FOIA Confidential Treatment Request

Ladies and Gentlemen:

ICAP Global Derivatives Limited ("IGDL") (**Applicant**) has submitted to the Commodity Futures Trading Commission (**Commission**) a rule certification in IGDL-2015-R-2 pursuant to CFTC Reg. 40.6 in order to amend its Rulebook (the "Certification"). Attached as Exhibit B-1 to the Certification is the revised Rulebook exclusive of confidential Chapter 9, attached as Exhibit B-2 is confidential Chapter 9, attached as Exhibit C-1 to the Certification is a marked version of the Rulebook exclusive of confidential Chapter 9 showing all changes to the last version submitted to the Commission, and attached as Exhibit C-2 is a marked version of Chapter 9.

The Applicant hereby requests that Chapter 9 of the Rulebook as set forth in Exhibit B-2 and Exhibit C-2 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 GLOBAL DERIVATIVES LIMITED, 2 Broadgate, London EC2M 7UR, United Kingdom.

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 GLOBAL DERIVATIVES LIMITED" and have identified each portion of the Confidential Information with the following identifying numbers and codes, as applicable: IGDL-2015-R-2-Exhibit B-2 and IGDL-2015-R-2-Exhibit C-2.

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

Thank you for your attention to this matter.

Sincerely,



Gregory Compa, Chief Compliance Officer

ICAP GLOBAL DERIVATIVES LIMITED

2 Broadgate

London

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cc by email: Division of Market Oversight, Commodity Futures
Trading Commission