



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

February 8, 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 Global Derivatives Limited ("IGDL") (**Applicant**) has submitted to the Commodity Futures Trading Commission (**Commission**) a rule certification in IGDL-2017-R-1 pursuant to CFTC Reg. 40.6 in order to amend its Rulebook (**Certification**). Attached as Exhibit B to the Certification is Confidential Chapter 9 of the Rulebook and attached as Exhibit C is a marked version of Confidential Chapter 9.

The Applicant hereby requests that Chapter 9 of the Rulebook as set forth in Exhibit B and Exhibit C 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-2017-R-1-Exhibit B and IGDL-2017-R-1-Exhibit C.

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', written in a cursive style.

Gregory Compa, Chief Compliance Officer  
**ICAP GLOBAL DERIVATIVES LIMITED**  
2 Broadgate  
London  
EC2M 7UR  
United Kingdom

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