

March 14, 2022

**VIA Electronic Portal**

CFTC FOIA Compliance Office  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, N.W  
Washington, D.C. 20581

**RE: FOIA Confidential Treatment Request – Modified CME Operational Risk Management Framework**

To Whom it May Concern:

On March 14, 2022, the Chicago Mercantile Exchange Inc. (“CME Clearing”) submitted its modified Operational Risk Management Framework (“Operational Risk Management Framework”) to the Commodity Futures Trading Commission (“CFTC” or “Commission”) via the CFTC Portal under 40.6(a). The submission consisted of the submission cover sheet and letter and the modified Operational Risk Management Framework, (the “Confidential Information”).

Pursuant to Sections 8 and 8(a) of the Commodity Exchange Act (“CEA”), as amended, and Commission Regulation 145.9(d), CME Clearing requests confidential treatment for the Operational Risk Management Framework on the grounds that disclosure of the contents would reveal confidential commercial information of the CME Clearing. Pursuant to Commission Regulation 145.9(d)(5), CME Clearing requests that confidential treatment be maintained until further notice from CME Clearing. We also request that the Commission notify the undersigned immediately after receiving any FOIA request or any other court order, subpoena or summons for same. Finally, we request that we be notified in the event the Commission intends to disclose the Operational Risk Management Framework to Congress or to any other governmental agency or unit pursuant to Section 8 of the CEA. CME Clearing does not waive its notification rights under Section 8(f) of the CEA with respect to any subpoena or summons for the Operational Risk Management Framework.

If you have any questions, please contact the undersigned at 312-930-8167 or via email at [sean.downey@cmegroup.com](mailto:sean.downey@cmegroup.com).

Sincerely,

/s/Sean Downey  
Chief Compliance Officer & Head of Policy  
CME Clearing