



## **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, Vice President, Regulatory Filings

**DATE:** 2019-04-30

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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 five-page document titled, “Summary of Backtesting and Impact Analysis for the Period 04/10/2017- 03/29/2018,” which is attached to SR-OCC-2019-002 as Exhibit 3.
- A 48-page document titled, “Margins Methodology, Quantitative Risk Management, Options Clearing Corporation,” which is attached to SR-OCC-2019-002 as Exhibit 5.

### **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: 2019-04-30*