



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
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Chicago, Illinois 60606
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BY: Justin Byrne, Vice President, Regulatory Filings

DATE: 2019-07-16

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 20-page document titled, “Risk Management Framework Policy,” which is attached to SR-OCC-2019-006 as Exhibit 5A.
- A 14-page document titled, “Clearing Fund Methodology Policy,” which is attached to SR-OCC-2019-006 as Exhibit 5B.
- A 12-page document titled, “Collateral Risk Management Policy,” which is attached to SR-OCC-2019-006 as Exhibit 5C.
- A 14-page document titled, “Counterparty Credit Risk Management Policy,” which is attached to SR-OCC-2019-006 as Exhibit 5D.
- A 10-page document titled, “Default Management Policy,” which is attached to SR-OCC-2019-006 as Exhibit 5E.
- A 15-page document titled, “Margin Policy,” which is attached to SR-OCC-2019-006 as Exhibit 5F.
- A nine-page document titled, “Model Risk Management Policy,” which is attached to SR-OCC-2019-006 as Exhibit 5G.

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: 2019-07-16