



Daniel E. Glatter  
General Counsel and Secretary

**TRADITION SEF, Inc.**

August 10, 2020

**VIA CFTC PORTAL**

Assistant Secretary of the Commission for FOIA,  
Privacy and Sunshine Acts Compliance  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, D.C. 20581

**RE: Tradition SEF, Inc. – FOIA Confidential Treatment Request**

Dear Sir or Madam:

By CFTC Portal submission today, August 10, 2020, Tradition SEF, Inc. (the “Submitter”) provided the information attached as Exhibit A (the “Confidential Information”) and attached hereto to the Commodity Futures Trading Commission (the “Commission”) and staff of the Division of Market Oversight regarding modifications to the Tradition SEF Trad-X USD IRS Liquidity Provider Program. .

Pursuant to Commission Rules 40.8 and 145.9(d), the Submitter requests confidential treatment of the Confidential Information consisting of Exhibit A to this submission on the grounds that disclosure of the Confidential Information would reveal confidential commercial and financial information of the Submitter and its employees and would be considered commercially material information to competitors of the Submitter.

Submitter’s notice that is reflected on Exhibit A contains information that is proprietary to the Submitter and forms an integral part of the competitive nature of the marketplace. Hence pending completion of its review and for the Submitter to continue to operate its business without undue inquiry, distraction or interruption, it is imperative that such information be treated as confidential. Accordingly, the Submitter requests confidential treatment of Exhibit A in its entirety.

Pursuant to Commission Rule 145.9(d)(5), the Submitter requests that confidential treatment of the Confidential Information be maintained until further notice from the Submitter. The Submitter requests that the Commission notify it immediately after receiving any request under the Freedom of Information Act (“FOIA”) or any other court order, subpoena or summons for the Confidential Information. The Submitter specifically notes that it does not waive, in any manner, its rights under Section 8(f) of the Commodity Exchange Act to receive a copy of any subpoena or summons for the Confidential Information prior to the Commission’s disclosure of such information pursuant to such subpoena or summons. Finally, the Submitter requests that the Commission notify it in the event that the Commission intends to disclose the Confidential Information to Congress or any federal or state governmental agency or department.

Assistant Secretary of the Commission for FOIA,  
Privacy and Sunshine Acts Compliance  
August 10, 2020  
Page 2

Should you require additional information related to this request, please contact the undersigned at (212) 377-2337 or [daniel.glatte@tradition.com](mailto:daniel.glatte@tradition.com).

Sincerely,

/s/ Daniel E. Glatter  
General Counsel and Secretary

Att.

**EXHIBIT A**  
**Confidential Information**

- Three page document titled “Tradition SEF Participant Notice 20-05 - Modifications to Tradition SEF - Trad-X USD IRS Liquidity Provider Program (“LPP”)”