

ICAP Global Derivatives Limited
2 Broadgate
London
United Kingdom
EC2M 7UR

August 16, 2017

By overnight mail and email

Assistant Secretary of the Commission for
FOI, Privacy and Sunshine Acts Compliance
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, D.C. 20581
FOIAsubmissions@cftc.gov

Re: Freedom of Information Act (“FOIA”) Confidential Treatment Request for Information Submitted to the Commodity Futures Trading Commission (“Commission”) by ICAP Global Derivatives Limited Pursuant to CFTC Regulation 40.6

Ladies and Gentlemen:

ICAP Global Derivatives Limited (“IGDL”), a swap execution facility registered with the Commission, today submitted to the Commission’s Division of Market Oversight a rule certification pursuant to Commission Regulation 40.6 in order to certify its amended Rulebook, including Confidential Chapter 9 (“Certification” or “IGDL-2017-R-5”). Attached as Exhibit C to the Certification is Confidential Chapter 9 of IGDL’s Rulebook, and attached as Exhibit E to the Certification is a marked version of Confidential Chapter 9 of IGDL’s Rulebook showing changes to the last version submitted to the Commission.

IGDL hereby requests pursuant to Section 145.9 of the Commission’s regulations that Exhibit C and Exhibit E to the Certification (“Confidential Documents”) be accorded confidential treatment on the grounds that disclosure would reveal IGDL’s trade secrets and confidential commercial and financial information and would be of material assistance to IGDL’s competitors. Our specification of these grounds for confidential treatment shall not preclude us from identifying additional grounds for confidential treatment at a later time.

Additionally, IGDL requests FOIA confidential treatment of any notes, memoranda or other records created by or at the direction of the Commission, its officers or staff members, that reflect, refer to or relate to the Confidential Documents (the “Confidential Records,” and together with the Confidential Documents, the “Confidential Information”).

This request for FOIA confidential treatment is sought for an indefinite period.

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Pursuant to Section 145.9(d)(4) of the Commission's regulations, we have marked each page of the Confidential Documents with the words "Confidential Treatment Requested by ICAP Global Derivatives Limited" and have identified each portion of the Confidential Documents with the identifying numbers and codes provided on Schedule A attached hereto.

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: Chief Compliance Officer, ICAP Global Derivatives Limited, 101 Hudson Street, Jersey City, NJ 07302.

In the event the Commission or its staff provides any of the Confidential Information to another federal agency, we request that the Commission provide a copy of this letter to such agency with the Confidential Information and further request that the Commission or its staff inform such agency that IGDL has requested that this material be accorded confidential treatment.

In addition, please note the accompanying request that your Office acknowledge receipt of the request for confidential treatment, by date-stamping and returning one copy of the enclosed cover letter, in the enclosed self-addressed, postage-prepaid envelope.

Thank you for your attention to this matter. Please contact Brian D. Donnelly, Chief Compliance Officer, at (201) 984-6956 with any questions.

Very truly yours,

ICAP Global Derivatives Limited

By: 

Name: Brian D. Donnelly
Title: Chief Compliance Officer
Date: August 16, 2017

cc: Division of Market Oversight, Commodity Futures Trading Commission
(dmosubmissions@cftc.gov)
Roger Smith, CFTC Division of Market Oversight (rsmith@cftc.gov)

SCHEDULE A

CONFIDENTIAL INFORMATION

Document Subject to Request for Confidential Treatment Pursuant to Commission Regulation 145.9	Identifying Number and Code
IGDL-2017-R-5 – Exhibit C	IGDL_0000095 – IGDL_0000136
IGDL-2017-R-5 – Exhibit E	IGDL_0000137 – IGDL_0000182