

Submitted via CFTC Portal

Assistant Secretary of the Commission for FOIA,
Privacy and Sunshine Acts Compliance
U.S. Commodity Futures Trading Commission
Systems Risk Analyst, Division of Market Oversight
1155 21st Street NW
Washington, DC 20581

Re: Clear Markets Request for Confidential Treatment

Dear Sir or Madam:

Clear Markets North America, Inc. (“Clear Markets”) is hereby submitting to the Secretary of the Commission and staff of the Division of Market Oversight the following materials (the “Confidential Submission”):

- Exhibit N-0 – Agreement List
- Exhibit N-19 – JSCC Clearing Agreement
- Exhibit N-20 – JSCC Side Letter

Each page of the Confidential Submission bears the legend “Confidential Treatment Requested by Clear Markets North America, Inc.”

As per the provisions of Commission Regulations 37.3(b)(2), 145.5 and 145.9, we hereby request confidential treatment of the Confidential Submission. Confidential treatment is requested, inter alia, on the grounds that the Confidential Submission contains data and information, which would separately disclose business transactions and trade secrets that may not be disclosed to third parties, as, provided in Section 8(a) of the Commodity Exchange Act and Commission Regulation 145.5(c)(1). Confidential treatment is also requested on the grounds that the Confidential Submission is exempt from disclosure under paragraph (b)(4) of the Freedom of Information Act (“FOIA”) and Commission Regulations 145.5(d) and 145.9(d)(1)(ii) because it contains commercial and financial information that is confidential and would be of material assistance to competitors of Clear Markets.

In accordance with the provisions of paragraph (d)(5) of Regulation 145.9, we request that the Confidential Submission be afforded confidential treatment in perpetuity. In the event the Commission receives a FOIA request for the Confidential Submission, we request that Commission Staff telephone or email the undersigned rather than rely on United States mail for notice of such requests. If the Commission or its staff transmits any of the Confidential Submission to another federal agency, we request that the Commission or its staff forward a copy of this letter to any such agency with the Confidential Submission and further request that you advise any such agency that Clear Markets has requested this material be accorded confidential treatment.

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Please direct any questions regarding this request for Confidential Treatment, as well as any notices pursuant to Commission Regulation 145.9(e) to the undersigned, using the contact information below.

Respectfully submitted,



Zachary J. King
Chief Compliance Officer
Clear Markets North America, Inc.
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980-819-1170

Cc: Roger Smith, Division of Market Oversight