

162 Fifth Avenue

Suite 900

New York, NY 10010

Tel: 646-786-8520

Fax: 212-675-5834

September 17, 2015

Via E-Mail: FOIAsubmissions@cftc.gov

Assistant Secretary of the Commission for FOIA Matters

Commodity Futures Trading Commission

Three Lafayette Centre,

1155 21st Street, N.W.

Washington, D.C. 20581

Re: FOIA Confidential Treatment Request: Petition Pursuant to Regulation 145.9(d)

To Whom It May Concern:

On this date, trueEX LLC (“trueEX”) submitted via the Commodity Futures Trading Commission’s (the "Commission") reporting portal at https://portal.cftc.gov the document listed below (referred to as “Confidential Materials”), which relate to trueEX’s DMM Program for Interest Rate Swaps in compliance with Core Principle 2 and CFTC Regulation 38.151, and Core Principle 7 and CFTC Regulation 38.401:

1. Exhibit A-2 – trueEX Designated Market Maker Program for Interest Rate Swaps.

By this petition, trueEX requests confidential treatment pursuant to Section 145.9(d) of the CFTC’s regulations of the Confidential Materials.

Pursuant to Sections 8(a) of the Act, and Commission Regulation § 145.9(d), trueEX requests confidential treatment of the Confidential Materials on the grounds that disclosure of such materials would reveal trade secrets of trueEX and/or reveal confidential pricing and commercial information of trueEX. The Confidential Materials are proprietary to trueEX and contain highly sensitive and confidential business and technology information; in addition to violating trueEX’s proprietary rights, the disclosure of the Confidential Materials would grant competitors an unfair competitive advantage and/or compromise the competitive advantages possessed by trueEX. Accordingly, trueEX has asked the Commission to take appropriate steps to keep Confidential Materials submitted to them confidential and to restrict the re-distribution of the Confidential Materials.



Pursuant to Commission Regulation § 145.9(d)(5), trueEX hereby requests that the Confidential Materials be afforded confidential treatment in perpetuity.

trueEX requests that the Commission notify the undersigned immediately after receiving any FOIA request, any court order, subpoena, or summons seeking to access the Confidential Materials in whole or in part. trueEX further requests notification (through the undersigned) in the event that the Commission intends to disclose the Confidential Materials in whole or in part to Congress or to any other governmental agency or unit pursuant to Section 8 of the CEA. trueEX does not waive its notification rights under Section 8(f) of the CEA with respect to any subpoena or summons with respect to the Confidential Materials in whole or in part.

Should you have any questions regarding the above, please do not hesitate to contact me by telephone at (312) 320-8934 or by email at fran@trueex.com.

Sincerely,



Fran Kenck

Chief Regulatory Officer

Chief Compliance Officer