

ICAP GLOBAL DERIVATIVES LIMITED 2 Broadgate London EC2M 7UR United Kingdom

September 23, 2015

<u>Via Email</u>

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 Via email: <u>FOIAsubmissions@cftc.gov</u>

Re: FOIA Confidential Treatment Request

Ladies and Gentlemen:

ICAP Global Derivatives Limited ("IGDL" or "Applicant") has submitted to the Commodity Futures Trading Commission (the "Commission") a rule certification in IGDL-2015-R-13 pursuant to CFTC Reg. 40.6 in order to amend confidential Chapter 9 of its Rulebook (the "Certification"). Attached as Exhibit A to the Certification is a concise explanation and analysis of the amendments to confidential Chapter 9 of the Rulebook, attached as Exhibit B to the Certification is the revised confidential Chapter 9 and attached as Exhibit C to the Certification is a marked version of confidential Chapter 9 showing all changes to the last version submitted to the Commission.

The Applicant hereby requests that Exhibit A, Exhibit B and Exhibit C to the Certification ("Confidential Information") be treated as confidential in order to prevent disclosure of Applicant's trade secrets and confidential commercial and financial information upon a request under the Freedom of Information Act ("FOIA"). We request the Confidential Information be provided confidential treatment for an indefinite period.

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: General Counsel, ICAP GLOBAL DERIVATIVES LIMITED, 2 Broadgate, London EC2M 7UR, United Kingdom.

Pursuant to Part 145.9(d)(4) of the Commission's regulations, we have marked each page of the Confidential Information with the words "Confidential Treatment Requested by ICAP GLOBAL DERIVATIVES LIMITED" and have identified each portion of the Confidential Information with the following identifying numbers and codes, as applicable: IGDL-2015-R-13-Exhibit A, IGDL-2015-R-13-Exhibit B and IGDL-2015-R-13-Exhibit C.

Please contact the undersigned at 212-341-9193 with any questions regarding this matter. Thank you for your attention to this matter.

Sincerely, /m

Gregory Compa, Chief Compliance Officer ICAP GLOBAL DERIVATIVES LIMITED 2 Broadgate London EC2M 7UR United Kingdom

cc by email: Division of Market Oversight, Commodity Futures Trading Commission