

tpSEF Inc.
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October 11, 2016

FOIA CONFIDENTIAL TREATMENT REQUEST

By overnight mail and email: FOIAsubmissions@cftc.gov

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

Re: Freedom of Information Act (“FOIA”) Confidential Treatment Request for Information Submitted to the CFTC by tpSEF Inc.

Dear Sir or Madam:

On October 11, 2016, tpSEF Inc. (“tpSEF”), a swap execution facility (“SEF”) registered with the U.S. Commodity Futures Trading Commission (“CFTC”), submitted to the Secretary of the CFTC via the CFTC Portal two additional agreements for inclusion as part of Exhibit N to tpSEF’s Form SEF (such submission, “tpSEF Submission 16-20A” or the “tpSEF Submission”). The tpSEF Submission was made pursuant to Section 5c(e) of the Commodity Exchange Act and CFTC Regulations 37.3(b)(3) and 40.6(a) and in response to a request from the CFTC’s Division of Market Oversight dated July 12, 2016.

tpSEF hereby requests, pursuant to CFTC Regulations 40.8 and 145.9, that the tpSEF Submission (the “Confidential Documents”) be accorded confidential treatment on the grounds that disclosure would reveal confidential commercial and financial information and would be of material assistance to competitors of tpSEF. Each page of the Confidential Documents has been labelled “Confidential Treatment Requested by tpSEF Inc.” and numbered as provided on Schedule A attached hereto.

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

This request for FOIA confidential treatment is sought for as long as the CFTC remains in control and/or possession of any Confidential Information.

Assistant Secretary of the Commission for FOI,
Privacy and Sunshine Acts Compliance
U.S. Commodity Futures Trading Commission
October 11, 2016

We request that if the CFTC receives a FOIA request for any Confidential Information, tpSEF will be notified of such request in accordance with the CFTC's regulations and have the opportunity to submit a written justification for confidential treatment of the Confidential Information.

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

In addition, we request that you acknowledge receipt of this request for confidential treatment by date-stamping and returning one copy of the enclosed cover letter in the enclosed self-addressed, postage-prepaid envelope.

Please promptly inform Mr. Brian Donnelly, Chief Compliance Officer, tpSEF Inc. at 101 Hudson Street, Jersey City, New Jersey 07302, bddonnelly@tullettprebon.com, of any request under FOIA seeking access to the Confidential Information to enable tpSEF to further substantiate the grounds for confidential treatment.

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Assistant Secretary of the Commission for FOI,
Privacy and Sunshine Acts Compliance
U.S. Commodity Futures Trading Commission
October 11, 2016

Thank you for your attention to this matter. If you have any questions, please contact Brian Donnelly, Chief Compliance Officer, by email at bddonnelly@tullettprebon.com or by phone at (201) 984-6956.

Very truly yours,

tpSEF Inc.

By: 

Name: Brian D. Donnelly

Title: Chief Compliance Officer

Date: October 11, 2016

Enclosures

cc: CFTC Division of Market Oversight (Email: dmosubmissions@cftc.gov)
Roger Smith, CFTC Division of Market Oversight (Email: rsmith@cftc.gov)

Assistant Secretary of the Commission for FOI,
Privacy and Sunshine Acts Compliance
U.S. Commodity Futures Trading Commission
October 11, 2016

SCHEDULE A
CONFIDENTIAL INFORMATION

| Document Subject to Request for Confidential Treatment Pursuant to §145.9 | Identifying Bates Number(s) |
|--|------------------------------------|
| tpSEF Submission 16-20A | 0025001 – 0025046 |