

DTCC Data Repository

55 WATER STREET
NEW YORK, NY 10041-0099

August 13, 2014

Assistant Secretary of the Commission for FOIA Matters
U.S. Commodity Futures Trading Commission
1155 21st Street, NW Room 2205
Washington, DC 20581

Re: *FOIA Confidential Treatment Request*

Dear Staff:

Pursuant to Section 145.9 of the U.S. Commodity Futures Trading Commission (the “Commission”) Regulations under the Commodity Exchange Act, as amended, DTCC Data Repository (U.S.) LLC (“DDR”) requests that the DDR Policies and Procedures, listed below, being submitted to the Commission, and the information contained in them, be afforded confidential treatment until further notice under the Freedom of Information Act and the Commission’s Regulations.

Policies and Procedures:

- DDR Code of Ethics;
- DDR Compliance Manual;
- DDR Compliance Department Procedures;
- DDR Systems Development and Monitoring Procedures;
- DDR Access & On-Boarding Procedures;
- DDR Financial Resources Procedures;
- DDR Privacy & Confidentiality Policy and Procedures; and
- DDR Conflict of Interest Resolution Policy.

The revised policies and procedures and other documents submitted in connection with the policies and procedures should be afforded confidential treatment based on, among other things, § 145.9(d)(1)(ii) of the Commission’s regulations as disclosure would reveal the submitters’ trade secrets or confidential commercial or financial information.”

If you have any questions regarding our request, please contact the undersigned at (212) 855-3273.

Very truly yours,


By: Paul Gottlieb
Title: DDR Counsel