

November 20, 2014

VIA ELECTRONIC PORTAL

Christopher J. Kirkpatrick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581

Re: FOIA Confidential Treatment Request

Dear Mr. Kirpatrick:

By electronic portal today, November 20, 2014, Chicago Mercantile Exchange Inc. ("CME") submitted CME Submission No. 14-492 to the Commodity Futures Trading Commission ("Commission"), which enclosed changes to the Manual of Operations for CME Cleared Credit Default Swaps (the "Confidential Information") relating to its acceptance of iTraxx credit default swap indices for clearing. The Confidential Information contains confidential and proprietary trade secrets and commercial information that could, if disclosed to the public, cause substantial harm to the competitive position of CME.

Pursuant to Sections 8 and 8(a) of the Commodity Exchange Act ("CEA"), as amended, and Commission Regulation 145.9(d), CME requests confidential treatment of the Confidential Information on the grounds that the Confidential Information contains confidential commercial information of the submitter (CME). Pursuant to Commission Regulation 145.9(d)(5), CME requests that confidential treatment be maintained for the Confidential Information until further notice from CME. We also request that the Commission notify the undersigned immediately after receiving any FOIA request for the Confidential Information or any other court order, subpoena or summons for same. Finally, we request that we be notified in the event the Commission intends to disclose the Confidential Information to Congress or to any other governmental agency or unit pursuant to Section 8 of the CEA. CME does not waive its notification rights under Section 8(f) of the CEA with respect to any subpoena or summons for the Confidential Information.

Please contact the undersigned at (212) 299-2228 should you have any questions concerning this letter.

Sincerely,

/s/Jason Silverstein
Executive Director and Associate General Counsel