

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

August 29, 2014

Via Email

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: FOIAsubmissions@cftc.gov and by overnight delivery

Re: FOIA Confidential Treatment Request

Ladies and Gentlemen:

ICAP Global Derivatives Limited ("IGDL") (Applicant) has submitted to the Commodity Futures Trading Commission (Commission) a rule certification in IGDL-2014-R-9 pursuant to CFTC Reg. 40.6 in order to, among other things, certify its amended fee schedule revising its minimum fee structure for Application Programming Interface services, and to amend its Trading Privilege Holder Agreement (the "Certification"). Attached as Exhibit D to the Certification is the revised Trading Privilege Holder Agreement and Attached as Exhibit E to the Certification is a marked version of the Trading Privilege Holder Agreement showing all changes to the last version submitted to the Commission. Attached as Exhibit F to the Certification is the revised fee schedule (the "Fee Schedule") and Attached as Exhibit G to the Certification is a marked version of the Fee Schedule showing all changes to the last version submitted to the Commission.

The Applicant hereby requests that Exhibit D, Exhibit E, Exhibit F and Exhibit G 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-2014-R-9-Exhibit D, IGDL-2014-R-9 Exhibit E, IGDL-2014-R-9 Exhibit F and IGDL-2014-R-9-Exhibit G.

Please contact IGDL at 212-341-9193 with any questions regarding this matter.

Thank you for your attention to this matter.

Sincerely,

Peter Best, Chief Operating Officer
ICAP GLOBAL DERIVATIVES LIMITED
Harborside Financial Center
1100 Plaza 5

Jersey City, NJ 07311

cc by email: Commodity Futures Trading Commission (<u>secretary@cftc.gov</u>)

Division of Market Oversight, Commodity Futures Trading Commission (dmosubmissions@cftc.gov)