



## **FOIA CONFIDENTIAL TREATMENT REQUESTED**

December 16, 2014

(Submitted electronically via the CFTC Portal)

Assistant Secretary of the Commission  
FOIA, Privacy and Sunshine Acts Compliance  
Commodity Futures Trading Commission  
Three Lafayette Centre, 8<sup>th</sup> Fl.  
1155 21st Street, N.W.  
Washington, DC 2058

### **Re: FOIA Confidential Treatment Request**

Dear FOIA Compliance Staff:

Via the CFTC Portal, in a letter addressed to Mr. Christopher Kirkpatrick, Office of the Secretariat of the Commission, dated today, December 16, 2014, ICE Clear US, Inc. ("ICUS") submitted a self-certification of amendments to the ICUS Rulebook and the ICUS Default Management Procedures, pursuant to Section 5c(c)(1) of the Commodity Exchange Act and Commission Regulation 40.6(a). In conjunction with that submission, ICUS submits the attached confidential document, Exhibit B - ICUS Default Management Procedures. ICUS hereby respectfully requests Confidential Treatment under the Freedom of Information Act ("FOIA"), 5 USC Section 552 and pursuant to Commission Regulation 145.9 for all information included in, and attached to, this submission (the "Confidential Information") until further notice.

The Confidential Information contains confidential and non-public information of ICUS which is exempt from disclosure pursuant to Section 552(b)(4) of FOIA and Commission Regulation 145.9(d). The basis for the request is that disclosure of these document(s) would reveal confidential commercial and financial information of ICUS, the disclosure of which could have a material adverse effect on, and cause injury to, the operations and competitive position of ICUS. ICUS also requests that the Commission notify the undersigned immediately after receiving any FOIA request for such documents or any other court order, subpoena or summons for the same. Finally, ICUS requests that it be notified in the event the Commission intends to disclose such documents to Congress or to any other governmental agency or unit pursuant to Section 8 of the Commodity

Exchange Act, as amended (“CEA”). ICUS does not waive its notification rights under Section 8(f) of the CEA with respect to any subpoena or summons for such document(s).

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If you should have any questions or comments or require further information, please contact me at (312) 836-6716 or [heidi.rauh@theice.com](mailto:heidi.rauh@theice.com).

Sincerely,



Heidi M. Rauh  
General Counsel and Chief Compliance Officer  
ICE Clear US, Inc.

Confidential Attachments

cc: Thomas Hammond  
Lynn Martin