



NEX SEF LIMITED
London Fruit and Wool Exchange
1 Duval Square
London
E1 6PW
United Kingdom

December 18, 2019

Via Email

Office of General Counsel
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581
Via email: FOIAsubmissions@cftc.gov

Re: FOIA Confidential Treatment Request

Ladies and Gentlemen:

NEX SEF Limited ("**Applicant**") has submitted to the Commodity Futures Trading Commission ("**Commission**") a rule certification in NEX SEF-2020-R-1 pursuant to CFTC Reg. 40.6 in order to issue a Market Regulation Advisory Notice and to amend its Rulebook ("**Certification**"). Attached as Exhibit B is MRAN 2020-01 and attached as Exhibit C is a marked version of MRAN 2020-01. Attached as Exhibit D is Chapter 9 of the Rulebook and attached as Exhibit E is a marked version of Chapter 9.

The Applicant hereby requests that MRAN 2020-01 as set forth in Exhibit B and Exhibit C to the Certification and that the Rulebook as set forth in Exhibit D and Exhibit E 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, NEX SEF LIMITED, London Fruit and Wool Exchange, 1 Duval Square, London E1 6PW, 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 NEX SEF LIMITED" and have identified each portion of the Confidential Information with the following identifying numbers and codes, as applicable: NEX SEF-2020-R-1-Exhibit B, NEX SEF-2020-R-1-Exhibit C, NEX SEF-2020-R-1-Exhibit D and NEX SEF-2020-R-1-Exhibit E.

Please contact the undersigned at (212) 521-4609 with any questions regarding this matter.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to be 'Nirup', with a long horizontal flourish extending to the right.

Nirup Ramalingam, Chief Operating Officer

NEX SEF LIMITED

London Fruit and Wool Exchange
1 Duval Square
London
E1 6PW
United Kingdom

cc by email: Division of Market Oversight, Commodity Futures
Trading Commission