

June 14, 2023

**VIA ELECTRONIC PORTAL**

CFTC FOIA Compliance Office  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, N.W  
Washington, D.C. 20581

**Re: CFTC Regulation 40.10(a) Advance Notice. Chicago Mercantile Exchange Inc.’s Notification to the Commission Regarding the Migration of Clearing and Settlement Systems to the Google Cloud Platform.  
Confidential Treatment Request – Supporting Exhibits A through Y.  
CME Submission No. 23-233S.**

To Whom it May Concern:

On June 14, 2023, Chicago Mercantile Exchange Inc. (“CME” or “CME Clearing”) submitted advance notice that CME will migrate the systems supporting its clearing and settlement functions to a cloud-based infrastructure hosted on the Google Cloud Platform (“GCP”) to the Commodity Futures Trading Commission (“CFTC” or “Commission”) via the CFTC Electronic Portal pursuant to CFTC Regulation 40.10(a). The submission consisted of the submission cover sheet, letter, and supplemental Exhibits A through Y (the “Confidential Information”).

Pursuant to Sections 8 and 8(a) of the Commodity Exchange Act (“CEA”), as amended, and Commission Regulation 145.9(d), CME Clearing requests confidential treatment for the Confidential Information on the grounds that disclosure of the contents would reveal confidential commercial information of the CME Clearing. Pursuant to Commission Regulation 145.9(d)(5), CME Clearing requests that confidential treatment be maintained until further notice from CME Clearing. CME Clearing also requests that the Commission notify the undersigned immediately after receiving any FOIA request or any other court order, subpoena or summons for same. Finally, CME Clearing requests notification 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 Clearing does not waive its notification rights under Section 8(f) of the CEA with respect to any subpoena or summons for the Confidential Information.

If you have any questions, please contact the undersigned at 212-299-2200 or via email at [christopher.bowen@cmegroup.com](mailto:christopher.bowen@cmegroup.com).

Sincerely,

/s/ Christopher Bowen  
Managing Director & Chief Regulatory Counsel