

July 17, 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: FOIA Confidential Treatment Request – CME Submission No. 23-301.**

To Whom it May Concern:

On July 17, 2023, Chicago Mercantile Exchange Inc. (“CME Clearing”) submitted a request for approval of the Amended and Restated Cross-Margining Agreement and Service Level Agreement between CME and Fixed Income Clearing Corporation (“FICC”) (the “Agreements”) to the Commodity Futures Trading Commission (“CFTC” or “Commission”) via the CFTC Electronic Portal pursuant to CFTC Regulation 40.6(a). The submission consisted of the submission cover sheet and letter and amendments to the Agreements, (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 Agreements 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 Agreements 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 Agreements.

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 and Chief Regulatory Counsel