

**VIA CFTC Portal**

August 29, 2023

Commodity Futures Trading Commission  
Attention: FOIA Compliance Office  
1155 21<sup>st</sup> Street NW  
Three Lafayette Centre  
Washington, DC 20581

**RE: FOIA Request for Confidential Treatment**

Dear Sir/Madam,

In accordance with Commission Regulation 145.9(d), LCH SA ("LCH") respectfully requests confidential treatment under the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, for the Portal submission on August 29, 2023, in relation to the document "8\_CALRM\_Liquidity Risk Modelling Framework V6.1\_final", including any subsequent emails and replies between LCH and Commission staff, regarding such submission (collectively, the "Confidential Information").

LCH is requesting confidential treatment for the Confidential Information pursuant to Commission Regulation 145.9(d)(ii), which provides that confidential treatment may be requested on the grounds that disclosure would reveal trade secrets or confidential commercial or financial information. LCH further requests that the Confidential Information receives confidential treatment in perpetuity.

This request is not to be construed as a waiver of any other protection from disclosure or confidential treatment accorded by law, and LCH will rely on and invoke any such confidentiality protection. LCH requests notification from the Commission in advance of any disclosure of the Confidential Information pursuant to the FOIA or the Commission's Rules of Practice so that this request for confidential treatment may be substantiated.

If you have any questions or comments or require further information, please do not hesitate to contact the undersigned at [ryan.hajen@lseg.com](mailto:ryan.hajen@lseg.com).

Yours sincerely,



Ryan Hajen  
Senior Compliance Manager  
LCH

**An LSEG Business**

LCH | 10 Paternoster Square | London EC4M 7LS | T: +44 (0)20 7426 7000 | F: +44 (0)20 7426 7001 | [lch.com](http://lch.com)

LCH Group Holdings Limited | LCH Limited | Banque Centrale de Compensation | LCH.Clearnet LLC

LCH Limited. Registered in England No. 25932 Registered Office: 10 Paternoster Square, London, EC4M 7LS