



Olivia Bazor
Staff Attorney

FOIA CONFIDENTIAL TREATMENT REQUEST

October 04, 2023

VIA ELECTRONIC PORTAL

Mr. Christopher Kirkpatrick
Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Re: Update to ICC’s Risk Parameter Setting and Review Policy Pursuant to Section 5c(c)(1) of the Commodity Exchange Act and Commission Regulation 40.6(a)

Dear Assistant Secretary:

In conjunction with the self-certification submitted by ICE Clear Credit LLC (“ICC”) today, October 04, 2023, to the Secretary of the Commodity Futures Trading Commission (“Commission”), pursuant to Section 5c(c)(1) of the Commodity Exchange Act and Commission Regulation 40.6(a), ICC submits the attached confidential document.

Under the Freedom of Information Act (“FOIA”), 5 USC Section 552, Section 809(g) of the Dodd-Frank Wall Street Reform and Consumer Protection Act and pursuant to Commission Regulations 40.8(c) and 145.9(d), Federal Reserve Board Regulation 261.15 and any other applicable regulations under or implementing FOIA, ICC hereby respectfully requests that confidential treatment be maintained for the document which bears Bates numbers 10.04.2023-000001-CFTC1 to 10.04.2023-000028-CFTC1 (“Confidential Material”) until further notice. ICC also requests that the Commission or the Board notify the undersigned immediately after receiving any FOIA request for such documents or any other court order, subpoena or summons for the same. Finally, ICC requests that it be notified in the event the Commission or the Board 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”) or other applicable law. ICC does not waive its notification rights under Section 8(f) of the CEA or other applicable law with respect to any subpoena or summons for such document(s).

The basis for the request is that disclosure of these document(s) would reveal confidential commercial and financial information of ICC, the disclosure of which could have a material adverse effect on, and cause injury to, the operations and competitive position of ICC. This request



is not to be construed as a waiver of any other protection from disclosure or confidential treatment accorded by law, and ICC will rely on and invoke any such confidentiality protection.

Please direct any questions or requests for information to the attention of the undersigned at olivia.bazor@ice.com or 904-855-5580.

Sincerely,

A handwritten signature in black ink, appearing to be the initials 'OB'.

Olivia Bazor
Staff Attorney