



Christopher Bowen  
Managing Director and Chief Regulatory Counsel  
Legal Department

May 18, 2017

**VIA ELECTRONIC PORTAL**

Mr. Christopher K. Kirkpatrick  
Office of the Secretariat  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, D.C. 20581

**Re: FOIA Confidential Treatment Request**

Dear Mr. Kirkpatrick:

By electronic portal dated today, May 18, 2017, The Board of Trade of the City of Chicago, Inc. ("CBOT" or the "Exchange") submitted a supplemental rule certification filing (Submission No. 17-192S) to the Commodity Futures Trading Commission ("CFTC" or "Commission"). This supplemental filing includes an appendix ("Appendix A"), which is attached.

Pursuant to Sections 8 and 8(a) of the Commodity Exchange Act ("CEA"), as amended, and Commission Regulation 145.9(d), CBOT requests confidential treatment of Appendix A, on the grounds that Appendix A contains confidential commercial information of a customer. Pursuant to Commission Regulation 145.9(d)(5), CBOT requests that confidential treatment be maintained for Appendix A until further notice from CBOT. We also request that the Commission notify the undersigned immediately after receiving any FOIA request for said Appendix A or any other court order, subpoena or summons for same. Finally, we request that we be notified in the event the Commission intends to disclose such Appendix A to Congress or to any other governmental agency or unit pursuant to Section 8 of the CEA. CBOT does not waive its notification rights under Section 8(f) of the CEA with respect to any subpoena or summons for such Appendix A.

Please contact the undersigned at (212) 299-2200 should you have any questions concerning this letter.

Sincerely,

/s/Christopher Bowen  
Managing Director and Chief Regulatory Counsel