

**FOIA CONFIDENTIAL TREATMENT REQUEST**

23 October 2019

Via E-mail to: FOIAsubmissions@cftc.gov

Assistant Secretary of the Commission for FOI,  
Privacy and Sunshine Acts Compliance  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street,  
NW Washington, DC 20581  
201-418-5000

Re: FOIA Confidential Treatment Request in Connection with Euronext Paris Foreign Board of Trade Application.

Dear Sir or Madam:

Euronext Paris SA ("Submitter") hereby respectfully requests that the Commodity Futures Trading Commission (the "CFTC") accord confidential treatment under 17 C.F.R. §145.9 to those portions of the exhibits to its application for registration as a foreign board of trade on Form FBOT (including the exhibits and supplements thereto), dated 13 July 2018, which are provided in redacted form hereto for illustrative purposes. This request is submitted pursuant to CFTC Rules 48.5 and 48.6, and specifically relates to:

Exhibits<sup>1</sup>

A-8: the paragraphs starting from the second one included;  
D-1(1): the paragraphs under "common customer gateway" and "universal trading manager (UTM)";  
D-1(2): the first two paragraphs including the chart and the paragraphs under "automated throttles";  
D-1(3): the full content;  
D-1(12): the paragraphs starting from the third one included;  
D-2(3): the full content;  
D-2(5) : the last two paragraphs;  
D-2(7): the paragraphs starting from the second one included;  
E-6: the fifth paragraph including the chart and the last three paragraphs;  
F(2) (vii): the fifth bullet point of the fourth paragraph, the sixth and the eight paragraphs;  
F(4): the second sentence of the paragraph under "market surveillance" and the paragraph under "on-site inspections"

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<sup>1</sup> For the purpose of identifying paragraphs , the numbering does not include the requirements in bold

**Euronext N.V.**

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TRADE REGISTER: 60234520

G-1 the second sentence of the first paragraph, the fifth paragraph and the second sentence of the sixth paragraph,  
G-2(3) the second paragraph,  
G-2(4) the last paragraph,  
G-2(6) the paragraphs starting from the second one included,  
G-2(9) the sixth and seventh paragraphs;  
G-4 the second paragraph

#### Appendices

Appendix 7 « guidance on documented procedures »

#### Certificate of good standing

The AMF has let us know that the certificate was for the specific attention of the CFTC and should not be posted on website.

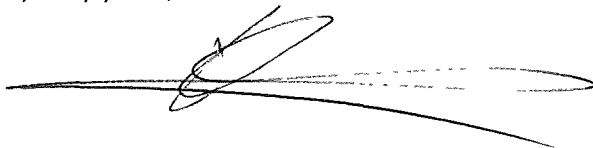
and all information derived therefrom (collectively, the "Confidential Information").

This request for confidential treatment is made pursuant to 17 C.F.R. §145.9(d)(l) because Submitter believes that the Confidential Information is covered by one or more exemptions in the Freedom of Information Act (the "FOIA") (5 U.S.C. §552(b)) and is therefore exempt from the CFTC's public disclosure requirements pursuant to 17 C.F.R. §145.5. In particular, 5 U.S.C. §552(b)(4) and 17 C.F.R. §145.9(d)(l)(ii) exempts disclosure that would reveal the Submitter's trade secrets or confidential commercial or financial information. Submitter believes that the Confidential Information contains confidential commercial and financial information as well as proprietary information regarding business procedures and systems that should be protected from public disclosure pursuant to this exemption. Confidential treatment is requested for a period of five years.

This request is not to be construed as a waiver of any other protection from disclosure or confidential treatment accorded by law, and Submitter will rely on and invoke any such confidentiality protection. Submitter requests that the CFTC advise the undersigned, pursuant to 17 C.F.R. §145.9(e)(l), in advance of any disclosure of the Confidential Information pursuant to the FOIA, so that this request for confidential treatment may be substantiated.

If you should have any questions or comments or require further information, please do not hesitate to contact the undersigned at +32 2 620 1580 or by email to [rjezek@euronext.com](mailto:rjezek@euronext.com)

Very truly yours,



R Jezek  
Group Head of Regulation & Government Affairs, Euronext

cc. Mr Jonathan M Lave, Division of market oversight