



CFTC FOIA CONFIDENTIAL TREATMENT REQUEST

TO: **CFTC FOIA COMPLIANCE OFFICE**
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

FROM: **THE OPTIONS CLEARING CORPORATION**
Legal Department
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Chicago, Illinois 60606
(312) 322-6200

BY: Michelle Weiler, Associate General Counsel

DATE: 2020-12-11

Pursuant to the Freedom of Information Act and the rules of the U.S. Commodity Futures Trading Commission (“Commission”) implementing FOIA, The Options Clearing Corporation (“OCC”) hereby requests confidential treatment for the record(s) (“Record(s)”) identified below:

RECORD(S) FOR WHICH CONFIDENTIAL TREATMENT IS REQUESTED:

- A nine (9) page document titled, “Bank Monitoring & Protective Measures Procedure,” which is attached to SR-OCC-2020-014 as Exhibit 3a.
- A seven (7) page document titled, “Bank On-Boarding & Off-Boarding Procedure,” which is attached to SR-OCC-2020-014 as Exhibit 3b.
- A twenty (20) page document titled, “Clearing Member Monitoring and Protective Measures Procedure,” which is attached to SR-OCC-2020-014 as Exhibit 3c.
- An eight (8) page document titled, “Clearing Member On-Boarding & Off-Boarding Procedure,” which is attached to SR-OCC-2020-014 as Exhibit 3d.
- A six (6) page document titled, “Clearing Member Risk Management Examination Procedure,” which is attached to SR-OCC-2020-014 as Exhibit 3e.
- A ten (10) page document titled, “Counterparties and Links Third-Party Risk Review Procedure,” which is attached to SR-OCC-2020-014 as Exhibit 3f.
- A seven (7) page document titled, “Credit and Liquidity Risk Working Group Procedure,” which is attached to SR-OCC-2020-014 as Exhibit 3g.
- A four (4) page document titled, “Exchange Working Group Procedure,” which is attached to SR-OCC-2020-014 as Exhibit 3h.
- A three (3) page document titled, “Operational Bank Monitoring and Review Procedure,” which is attached to SR-OCC-2020-014 as Exhibit 3i.

- A four (4) page document titled, “Vendor Risk Working Group Procedure,” which is attached to SR-OCC-2020-014 as Exhibit 3j.
- A twelve (12) page document titled, “Counterparty Credit Risk Management Policy,” which is attached to SR-OCC-2020-014 as Exhibit 5b.
- A twenty (20) page document titled, “Risk Management Framework Policy,” which is attached to SR-OCC-2020-014 as Exhibit 5c.
- A sixteen (16) page document titled, “Liquidity Risk Management Framework,” which is attached to SR-OCC-2020-014 as Exhibit 5d.
- A sixteen (16) page document titled, “Margin Policy,” which is attached to SR-OCC-2020-014 as Exhibit 5e.
- An eleven (11) page document titled, “Collateral Risk Management Policy,” which is attached to SR-OCC-2020-014 as Exhibit 5f.

BASIS:

- Business confidentiality - The Record(s) contain(s) contain the trade secrets or confidential commercial or financial information of a self-regulatory organization and are being provided to the Commission’s staff in response to a request made pursuant to the Commission’s oversight authority. OCC’s request for confidential treatment extends to any derivative works (regardless of media) containing the above described Record(s) or otherwise based thereon.

FOIA Notice: 2020-12-11