



Michael Lee  
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Submitted via CFTC Portal

Assistant Secretary of the Commission for FOI, Privacy and Sunshine Acts Compliance  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, D.C. 20581

**Re: FOIA Confidential Treatment Request – SpectrAxe**

Dear Assistant Secretary,

SpectrAxe LLC (“SpectrAxe”) hereby requests that the U.S. Commodity Futures Trading Commission (the “Commission”) accord confidential treatment under the Freedom of Information Act (the “FOIA”) to the attached SpectrAxe Fee Schedule (the “Fee Schedule”) and SpectrAxe Price Maker Discount Program (the “Discount Program”), which were submitted to the Commission on this date pursuant to Commission Regulation 40.6. This request pertains to all material set forth in the Fee Schedule and Discount Program, and additional redacted versions of the Fee Schedule and Discount Program are included with this submission. SpectrAxe requests that confidential treatment be afforded as long as the Commission retains the Fee Schedule and Discount Program. In accordance with the Commission’s FOIA regulations, the Fee Schedule and Discount Program each bear the designation “Confidential Treatment Requested by SpectrAxe LLC”.

This request for confidential treatment under the FOIA is made pursuant to Commission Regulation 145.9(d), as the Fee Schedule and Discount Program contain information that would reveal the trade secrets or confidential commercial or financial information of SpectrAxe and its affiliates. As required by Commission Regulation 145.9(d), SpectrAxe has submitted, together with this request, a written justification in support of the confidentiality of the Fee Schedule.

This request shall not be construed as a waiver of any protection from disclosure or confidential treatment under Commission Regulations or any other protection from disclosure or confidential treatment accorded by law, and SpectrAxe will rely on and invoke any such confidentiality protection with respect to the Fee Schedule and Discount Program. SpectrAxe requests that the Commission advise the undersigned, its representative, in advance of any disclosure of the Fee Schedule or Discount Program pursuant to the FOIA so that this request for confidential treatment may be further substantiated. SpectrAxe further requests that if any of the Confidential Information is to be disclosed to Congress or any other federal or state governmental agency or department, a request for confidential treatment be made by the Commission on SpectrAxe’s behalf, or that we be permitted to make such a request directly.

If you have any questions, please do not hesitate to contact Cheryl L. Isaac, K&L Gates, LLP at +1-202-778-9089 or cheryl.isaac@klgates.com, or the undersigned at +1-929-581-0340 or mlee@spectraxe.com.

Very truly yours,

Michael Lee  
Chief Compliance Officer  
SpectrAxe, LLC

**SpectrAxe, LLC**

**Fee Schedule**

[REDACTED]

**SpectrAxe, LLC**  
**Discount Program**

[REDACTED]