

AQUA-INDEX EXCHANGE, LLC
216 West Jackson Blvd
Suite 400
Chicago, IL 60606

Via E-mail

May 27, 2015

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

Re: FOIA Confidential Treatment Request: Petition Pursuant to Regulation 145.9(d)

To Whom It May Concern:

On this date, AQUA-INDEX EXCHANGE, LLC ("AIX") submitted by e-mail to Christopher J. Kirkpatrick, Secretary of the Commodity Futures Trading Commission (the "Commission"), the pdf file listed below, which constitutes AIX's application to be designated as a contract market pursuant to Section 5 of the Commodity Exchange Act, as amended (the "CEA"), and Part 38 of the regulations promulgated by the Commission:

1. DCM_Application_Privileged_and_Confidential.pdf.

By this petition, AIX requests confidential treatment of the following materials contained in the above-mentioned pdf file, a copy of which is attached to the e-mail by which this petition is being submitted. Each page of following materials is marked with the statement "Confidential Treatment Requested by AQUA-INDEX EXCHANGE, LLC" pursuant to Section 145.9(d) of the Commission's regulations promulgated under the CEA.

1. Exhibit A (ownership information);
2. Exhibit B (officer and director information), including appended Exhibits B-1 through B-6;
3. Exhibit C (fitness standards; composition of board);
4. Exhibit D (organizational structure);
5. Exhibit E (personnel qualifications);
6. Exhibit F (staffing requirements);
7. Exhibit H (legal proceedings);
8. Exhibit I (financial information), including Appendices 1 through 3;

9. Exhibit J (affiliates' financials);
10. Exhibit K (dues and fees);
11. Exhibit M-1 (Proposed Rule 403) and Exhibit M-2 (Overview of the Aqua-Index Agricultural Commodity Index Water Futures);
12. Exhibit N (executed and executable agreements), including appended Exhibits N-1 through N-11;
13. Exhibit O (compliance manual), including appended Exhibit O-1;
14. Exhibit P (disciplinary tools and procedures);
15. Exhibit Q (matching algorithm with examples);
16. Exhibit R (rules prohibiting trade practice violations);
17. Exhibit S (maintenance of trading data);
18. Exhibit T (clearing arrangements);
19. Exhibit U (information subject to confidentiality request); and
20. Exhibit V (technology questionnaire).

Pursuant to Sections 8(a) of the CEA, and Commission Regulation § 145.9(d), AIX requests confidential treatment of the Confidential Materials under the Freedom of Information Act on the grounds that disclosure of such materials would reveal trade secrets and/or confidential commercial information of AIX. The Confidential Materials are proprietary to AIX and contain highly sensitive and confidential business and technology information. In addition to violating AIX's proprietary rights, the disclosure of the Confidential Materials would grant competitors an unfair competitive advantage and/or compromise the competitive advantages possessed by AIX. Accordingly, we ask that you take appropriate steps to keep the Confidential Materials confidential and that you restrict the re-distribution of the Confidential Materials.

Pursuant to Commission Regulation § 145.9(d)(5), AIX hereby requests that the Confidential Materials be afforded confidential treatment in perpetuity.

AIX requests that the Commission notify the undersigned immediately after receiving any Freedom of Information Act request, any court order, subpoena, or summons seeking to access the Confidential Materials in whole or in part. AIX further requests notification (through the undersigned) in the event that the Commission intends to disclose the Confidential Materials in whole or in part. AIX does not waive its notification rights under Section 8(f) of the CEA with respect to any subpoena or summons with respect to the Confidential Materials in whole or in part.

Please contact Donna Redel or Kenneth M. Raisler using the information below if you have any questions regarding this request for confidential treatment.

Donna Redel
Phone: (212) 737-2956

Kenneth M. Raisler
Sullivan & Cromwell LLP
125 Broad Street
New York, NY 10004
Phone: (212) 558-4675

Sincerely,



Donna Redel
Chief Executive Officer
AQUA-INDEX EXCHANGE, LLC

(Enclosures)

cc: Christopher J. Kirkpatrick
(Commodity Futures Trading Commission)

Yaacov Shirazi
Gerald L. Fishman
(AQUA-INDEX EXCHANGE, LLC)

Kenneth M. Raisler
David J. Gilberg
(Sullivan & Cromwell LLP)