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FOUNDED 1866

June 14, 2016

By email: FOIAsubmissions@cftc.gov

CFTC FOIA Compliance Office
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: FOIA Confidential Treatment Request – Cleartrade Exchange Pte. Limited

Dear Assistant Secretary:

Pursuant to Regulation 145.9 of the Commodity Futures Trading Commission (“CFTC”), Cleartrade Exchange Pte. Limited (“Cleartrade”) requests that the CFTC afford confidential treatment under the Freedom of Information Act to certain communications and documents (collectively, the “Material”) submitted by or on behalf of Cleartrade to the CFTC with regard to Cleartrade’s application to become a registered foreign board of trade, which was submitted to the CFTC staff on November 30, 2015 (“FBOT Application”).

Cleartrade requests confidential treatment for certain Exhibits of its FBOT Application and certain supporting materials associated with its FBOT Application. Please see included with this letter a list of the specific Material for which Cleartrade requests confidential treatment, as well as a version of that FBOT Application that redacts the portions of Cleartrade’s FBOT Application for which confidential treatment is requested. Confidential treatment is requested on the grounds that disclosure of the Material would reveal trade secrets or confidential commercial and financial information concerning Cleartrade. This request for confidential treatment supersedes the previous request for confidential treatment submitted on November 30, 2015.

The submitter is Cleartrade. The submitter’s address is 61 Robinson Road, #13-03A, Robinson Centre, Singapore, 068893, Attention: Lim Poh Leong, Head of Compliance, Cleartrade Exchange Pte Limited. The submitter’s telephone number is (011) +65 6372 9566.

Confidential treatment of the Material is sought until such time as the submitter notifies the CFTC that the Material is no longer deemed confidential.

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If you have questions, you may reach me at (212) 839-5503 or email address msackheim@sidley.com.

Very truly yours,



Michael S. Sackheim

MSS:fl

cc: Zhirui Ang, Cleartrade Exchange Pt. Limited
Lim Poh Leong, Cleartrade Exchange Pt. Limited
Duane Andresen, CFTC, Division of Market Oversight
Aaron Brodsky, CFTC, Division of Market Oversight

FOIA CONFIDENTIAL TREATMENT REQUEST

CLEARTRADE FBOT APPLICATION

- FBOT Application Exhibit A-8
- FBOT Application Exhibit D
- FBOT Application Exhibit G-2
- FBOT Application Exhibit G-4
- Appendix F - LCH Agreement
- Appendix I - Letter from MAS to CE Dated 3-8-11
- Appendix J - MAS Letter to CE Dated 11-20-12
- Appendix M - CE Member Take-On and Due Diligence Procedures Manual
- Appendix N - CE Operations Procedures Manual
- Appendix O - CE Staff Handbook
- Appendix P - CE Business Continuity Plan
- Appendix Q - CE Compliance Manual
- Appendix R- CE Error Trades Procedures Manual
- Appendix S - CE Irregular Trades Procedures Manual
- Appendix T - CE No-Cancellation Range Procedures Manual
- Appendix U - CE IT Policy and Procedures
- Appendix V - CE Infrastructure and Security Overview
- Appendix W - CE Compliance Monitoring Procedures
- Appendix X - CE Appeals Committee
- Appendix Z - Compliance Asia Agreement
- Appendix HH – MAS Approval Letter for Option Contracts
- Appendix II – MAS Approval of Fertilizer Contracts
- Appendix KK – Contracts Available for Direct Access in the United States