



June 9, 2015

Sent by email to dmoletters@cftc.gov;
cc FBOTapplications@cftc.gov, dandresen@cftc.gov and abrodsky@cftc.gov
and by mail.

Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street NW
Washington, D.C. 20581

Attention: Assistant Secretary of the Commission for FOIA Matters

Dear Sirs:

**Re: ADDITIONAL REQUEST FOR CONFIDENTIAL TREATMENT - ICE Futures Canada, Inc.
Updated FBOT Application**

Pursuant to 17 C.F.R. § 145.9 (d) (1) (ii), on behalf of ICE Futures Canada, Inc. and ICE Clear Canada, Inc. (collectively, the "Submitters") confidential treatment is requested under the *Freedom of Information Act*, 5 U.S.C. § 552, over Attachment D-1 (15) ["How the ICE Market Works"] to Exhibit D ["The Automated Trading System"] of the updated Foreign Board of Trade Application as set out in materials included on a CD (collectively the "FBOT Application"), provided under cover letter dated April 9, 2015 addressed to the Secretary of the Commission and Messrs. D. Andresen and A. Brodsky.

The Submitters request confidential treatment of Attachment D-1 (15) ["How the ICE Market Works"] to Exhibit D ["The Automated Trading System"] on the grounds that it is subject to the exemption provided by 5 U.S.C. § 552 (b) (4). Section 552 (b) (4) protects trade secrets and commercial or financial information obtained from a person when disclosure is likely to cause substantial competitive harm to the person. The Submitter submits that the Attachment includes commercial sensitive business information and highly sensitive competitive information and such information should be protected on a strictly confidential basis.

Accordingly, the Submitters request confidential treatment of the said Attachment, and further request that same be maintained in a non-public file and that access to it by third parties be denied except as specifically permitted by law.

The name, address and phone number of the Submitters is as follows:

ICE Futures Canada FBOT Application
Request to CFTC for Confidential Treatment
June 9, 2015
Page 1 of 2



ICE Futures Canada, Inc./ICE Clear Canada, Inc.
850A Pembina Highway
Winnipeg, Manitoba
R3M 2M7 Canada
Attention: Linda Vincent, General Counsel
Telephone: (204) 925-5009
Fax: (204) 925-5014

This request is not to be construed as a waiver of any other protection from disclosure or confidential treatment accorded by law, and the Submitters will rely on and invoke any such confidentiality protection. The Submitters request that the CFTC advise the undersigned, pursuant to 17 C.F.R. 145.9 (e) (1), in advance of any disclosure of the Confidential Information pursuant to the FOIA, so that this request for confidential treatment may be substantiated.

We enclose a revised copy of the List of Attachments for your records, reflecting the confidentiality of Attachment D-1(15).

If you should have any questions or require any further information please do not hesitate to contact the undersigned at linda.vincent@theice.com or 204-925-5009.

Thank you for your attention on this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Linda Vincent".

Linda Vincent
General Counsel

cc: Secretary of the Commission
Mr. D. Andresen, Special Counsel
Mr. A. Brodsky, Attorney Advisor