



February 9, 2015

**VIA ELECTRONIC SUBMISSION AND FEDERAL EXPRESS**

Office of the Secretary  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, NW  
Washington, DC 20581

Re: Request for Temporary Registration as a Swap Execution Facility

Dear Ladies and Gentlemen:

FTSEF LLC (“FTSEF”) is hereby submitting to the U.S. Commodity Futures Trading Commission (“Commission”) a Swap Execution Facility Application on Form SEF pursuant to Section 5h of the Commodity Exchange Act and Part 37 of the Commission Regulations together with a request for temporary registration as a swap execution facility pursuant to Commission Regulation 37.3(c).

FTSEF further requests that the Commission grant FTSEF’s application for full registration pursuant to Commission regulation 37.3(b). Pursuant to Commission regulation 37.3(b)(1)(iii), FTSEF requests from the Commission a unique, extensible, alphanumeric code for the purpose of identifying the SEF pursuant to part 45 of the Commission’s regulations.

FTSEF is separately submitting to the Assistant Secretary of the Commission for Freedom of Information a request for confidential treatment of the documents listed on Appendix A hereto (the “Confidential Information”). The basis for this petition for confidential treatment is CFTC Regulation Section 145.9(d)(1)(ii), in that the Confidential Information contains trade secrets and confidential commercial and/or financial information. We request this confidential treatment for an indefinite period.

If you have any questions concerning this application, please contact Carl Schranz at 516-627-8993, ext 296 or [Carl.Schranz@flextrade.com](mailto:Carl.Schranz@flextrade.com).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Vijay Kedia', is written over a light blue horizontal line.

Vijay Kedia

cc:

Nancy Markowitz, Division of Market Oversight, Commodity Futures Trading Commission  
(E-mail: [NMarkowitz@cftc.gov](mailto:NMarkowitz@cftc.gov))

## APPENDIX A

Each of the following exhibits to Form SEF is subject to a request for confidential treatment pursuant to § 145.9 of the Commission's regulations:

A	Owners and Control Persons
A-1	List of Owners and Control Persons
A-2	Agreements Describing Basis for Control
B	Director and Officer Information
D	Organizational Structure
D-1	Organizational Chart
D-2	List of Affiliated Entities
E	Professional Employees and Qualifications
F	Staffing Requirements and Key Employees
H	Material Pending Legal Proceedings
I	Financial Exhibits
I-1	Financial Exhibits
I-2	Financial Exhibits
I-3	Financial Exhibits
I-4	Financial Exhibits
I-5	Financial Exhibits
J	Financial Information of Affiliates
K	Fee Schedule
M-2	Users Guide
N	Third Party Agreements
N-1	Third Party Agreements
N-2	Third Party Agreements
N-3	Third Party Agreements
N-4	Third Party Agreements
N-5	Third Party Agreements
O	Compliance Manual and Certain Other Policies
O-1	Compliance Manual and Certain Other Policies
O-2	Compliance Manual and Certain Other Policies
P	Investigation and Enforcement Proceedings
Q	Trading System Description
R	List of Rules Prohibiting Trade Practice Violations
S	Description of How Trade Data will be Maintained by SEF
T	List of Clearing Organizations
T-1	Third Party Agreements
V	Technology Questionnaire