

June 7, 2012

VIA Hand-Delivery and U.S. Mail

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, DC 20581

RE: FOIA Confidentiality Treatment Request

To Whom it May Concern,

In accordance with Commodity Futures Trading Commission (“CFTC” or “Commission”) Regulation Section 145.9, Chicago Mercantile Exchange Inc. (“CME Inc.”) hereby petitions the Commission that the documents listed on the Appendix hereto (the “Confidential Information”) be accepted and retained in confidence by the Commission. CME Inc. is sending the Confidential Information to the CFTC's Office of the Secretariat and to Lois Gregory by email today.

CME Inc. requests that the Confidential Information be retained in confidence until further notice as against any requester who files with the Commission a request to inspect such information pursuant to the Freedom of Information Act (“FOIA”).

The basis for this petition for confidential treatment is Regulation Section 145.9(d)(1)(ii), in that such information contains trade secrets and confidential commercial and/or financial information. I understand that this petition will not be evaluated by the Commission unless and until an FOIA request has been filed for inspection of this subject matter. In that event, please contact me at (312) 466-7478.

Sincerely,



Timothy R. Elliott
Director and Associate General Counsel

cc: Office of the Secretariat
Lois Gregory

APPENDIX

CONFIDENTIAL INFORMATION

Document	Description
Application Cover Letter	Cover letter to CME Inc.'s SDR application
Form SDR	CME Inc.'s SDR application
Exhibit A	List of control persons of CME Inc.
Exhibit B - 2	List of officers and directors of CME Inc.
Exhibit C	Information regarding the chief compliance officer for CME Inc.'s SDR
Exhibit F	Conflict of interest policies applicable to CME Inc.'s SDR
Exhibit G	List of all CME Inc. affiliates; copy of agreements that will enable CME Inc. to comply with registration requirements and core principles and board and ownership information for CME Inc.'s parent company
Exhibit I	Opinion of counsel
Exhibit I-1	Designation of agent
Exhibit K	CME Inc.'s internal disciplinary policies
Exhibit L	Material pending legal proceedings
Exhibit M	CME Inc. financial information
Exhibit N	Financial information of certain CME Inc. affiliates
Exhibit O	CME Inc.'s SDR fee schedule
Exhibit P	Information regarding service providers to CME Inc.'s SDR
Exhibit Q	User manual for CME Inc.'s SDR
Exhibit R	Description of system test procedures, tests conducted, or test results that will enable CME Inc.'s SDR to comply with core principles
Exhibit S	Services to be performed by CME Inc.'s SDR
Exhibit T	List of CME Inc. computer hardware used to perform SDR functions
Exhibit U	Qualifications of CME Inc.'s SDR's professional personnel
Exhibit V	Description of CME Inc.'s SDR's data security and verification measures
Exhibit W	CME Inc.'s SDR's emergency policies and procedures and business continuity-disaster recovery plan
Exhibit X	Description of relevant backup systems
Exhibit Y	Technical information about CME Inc.'s SDR systems
Exhibit Z	Information regarding users of CME Inc.'s SDR, disciplinary actions and the data elements for public reporting
Exhibit AA	Information sharing/confidentiality agreements
Exhibit BB	Description of policies and procedures that limit CME Inc.'s SDR services

Exhibit CC	CME Inc.'s SDR User Agreement
Exhibit DD	Description of requirements for persons requesting access to CME Inc.'s SDR data
Exhibit EE	Policies for reviewing limitations on access to CME Inc.'s SDR
Exhibit GG-1	Policies and procedures to protect privacy of swap data
Exhibit HH	Policies and procedures to protect section 8 data, market participant data, and intellectual property
Exhibit II	Policies and procedures regarding use of data
Exhibit JJ	Policy for resolving disputes regarding data accuracy
Exhibit KK	Policies and procedures relating to calculation of positions
Exhibit LL	Policies and procedures to ensure CME Inc.'s SDR does not invalidate or modify provisions in valid swaps
Exhibit MM	Procedures addressing withdrawal from SDR designation