



October 31, 2012

VIA 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" or "Exchange") hereby petitions the Commission that the email sent by George Gilbert on behalf of CME on October 31, 2012 to Jonathan Lave and Laurie Gussow at CFTC and the attached documents including: (1) CDS index list; (2) IRS index list; (3) CME response to Staff questions; and (4) CME SDR CCO conflict of interest policy (the "Confidential Information") be accepted and retained in confidence by the Commission.

The Exchange 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 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,

_____/s/_____
Timothy R. Elliott
Executive Director and Associate General
Counsel

cc: J. Lave
L. Gussow