



ICAP GLOBAL DERIVATIVES LIMITED  
2 Broadgate  
London  
EC2M 7UR  
United Kingdom

Assistant Secretary of the Commission for  
FOI, Privacy and Sunshine Acts  
Compliance  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, NW  
Washington, D.C. 20581  
Via email: [FOIAsubmissions@cftc.gov](mailto:FOIAsubmissions@cftc.gov) and by overnight delivery

January 13, 2014

Re: **FOIA Confidential Treatment Request**

Ladies and Gentlemen:

ICAP GLOBAL DERIVATIVES LIMITED (**Applicant**) has submitted to the Commodity Futures Trading Commission (**Commission**) a Swap Execution Facility Application for Registration on Form SEF (collectively with each exhibit thereto, the **SEF Application**) in order to seek registration as a swap execution facility pursuant to Commission Regulation 37.3(c).

The Applicant hereby requests that the limited sections of the SEF Application detailed in Appendix A hereto (**Confidential Information**) be treated as confidential in order to prevent disclosure of Applicant's trade secrets and confidential commercial and financial information upon a request under the Freedom of Information Act (**FOIA**). We request the Confidential Information be provided confidential treatment for an indefinite period.

Please promptly inform the following of any request for the Confidential Information or its contents made pursuant to FOIA or the Commission's rules so that we may substantiate the foregoing request for confidential treatment in accordance with Section 145.9 of the Commission's Regulations: Attention: General Counsel, ICAP GLOBAL DERIVATIVES LIMITED, 2 Broadgate, London EC2M 7UR, United Kingdom.

Pursuant to Part 145.9(d)(4) of the Commission's regulations, we have marked each page of the Confidential Information with the words "Confidential Treatment Requested by ICAP GLOBAL DERIVATIVES LIMITED" and have identified each portion of the Confidential Information with an identifying number and code.

Please acknowledge receipt of this letter by stamping the enclosed copy of this letter and returning it via the pre-paid envelope included with the materials.

Please contact the undersigned at 212-815-9193 with any questions regarding this matter.

Thank you for your attention to this matter.

Sincerely,



Gregory Compa, Chief Compliance Officer  
**ICAP GLOBAL DERIVATIVES LIMITED**  
2 Broadgate  
London EC2M 7UR  
United Kingdom

Cc by email: Commodity Futures Trading Commission ([secretary@cftc.gov](mailto:secretary@cftc.gov))

Division of Market Oversight, Commodity Futures Trading  
Commission ([dmosubmissions@cftc.gov](mailto:dmosubmissions@cftc.gov))

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