



ICAP SEF (US) LLC
Harborside Financial Center
1100 Plaza 5
Jersey City, NJ 07311

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

August 30, 2013

Re: **FOIA Confidential Treatment Request**

Ladies and Gentlemen:

ICAP SEF (US) LLC (**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 SEF (US) LLC, Harborside Financial Center, 1100 Plaza 5, Jersey City, NJ 07311.

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 SEF (US) LLC" 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,

A handwritten signature in black ink, appearing to read "Gregory Compa". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Gregory Compa, Chief Compliance Officer
ICAP SEF (US) LLC
Harborside Financial Center
1100 Plaza 5
Jersey City, NJ 07311

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

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

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

Amir Zaidi, Division of Market Oversight, Commodity Futures Trading
Commission (AZaidi@cftc.gov)

Appendix A
Confidential Information

Name of Confidential Information	Identifying Number and Code
Exhibit A	ICAP SEF Application – Exhibit A: ICAP Group Ownership
Exhibit B-2	ICAP SEF Application – Exhibit B-2: SEF Director and Committee Member Compensation
Exhibit D	ICAP SEF Application – Exhibit D: Organizational Structure of the SEF
Exhibit D-1	ICAP SEF Application – Exhibit D-1
Exhibit D-3	ICAP SEF Application – Exhibit D-3
Exhibit D-4	ICAP SEF Application – Exhibit D-4: SEF Jurisdictional Table
Exhibit E	ICAP SEF Application – Exhibit E: Personnel Qualifications for Professional Employees
Exhibit F	ICAP SEF Application – Exhibit F: Staffing Requirements
Exhibit H	ICAP SEF Application – Exhibit H: Legal Proceedings
Exhibit I	ICAP SEF Application – Exhibit I: Financial Statements
Exhibit K	ICAP SEF Application – Exhibit K: Fees for Trade Execution and SEF Access
Exhibit N-1	ICAP SEF Application – Exhibit N-1
Exhibit N-2	ICAP SEF Application – Exhibit N-2
Exhibit N-3	ICAP SEF Application – Exhibit N-3
Exhibit N-4	ICAP SEF Application – Exhibit N-4
Exhibit N-5	ICAP SEF Application – Exhibit N-5
Exhibit N-6(A)	ICAP SEF Application – Exhibit N-6(A)
Exhibit N-6(B)	ICAP SEF Application – Exhibit N-6(B)
Exhibit N-7	ICAP SEF Application – Exhibit N-7
Exhibit N-8	ICAP SEF Application – Exhibit N-8
Exhibit N-9	ICAP SEF Application – Exhibit N-9
Exhibit N-10	ICAP SEF Application – Exhibit N-10
Exhibit N-11	ICAP SEF Application – Exhibit N-11
Exhibit N-12	ICAP SEF Application – Exhibit N-12
Exhibit N-13	ICAP SEF Application – Exhibit N-13
Exhibit N-14	ICAP SEF Application – Exhibit N-14
Exhibit N-15	ICAP SEF Application – Exhibit N-15
Exhibit N-16	ICAP SEF Application – Exhibit N-16
Exhibit N-17	ICAP SEF Application – Exhibit N-17
Exhibit O	ICAP SEF Application – Exhibit O: Compliance Manual
Exhibit Q	ICAP SEF Application – Exhibit Q: SEF Trading System & Platform
Exhibit S	ICAP SEF Application – Exhibit S: Trade Data Maintenance
Exhibit V	ICAP SEF Application – Exhibit V: Technology Questionnaire Response