



MarketAxess SEF Corporation
299 Park Avenue, 10th Floor
New York, NY 10171

July 12, 2013

VIA U.S. Mail

Assistant Secretary of the Commission for FOIA,
Privacy and Sunshine Acts Compliance
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581
email: FOIAsubmissions@cftc.gov

RE: Freedom of Information Act (“FOIA”) Confidential Treatment Request

To Whom it May Concern:

MarketAxess SEF Corporation (the “Applicant”) has submitted to the Commodity Futures Trading Commission (“CFTC” or “Commission”) a Swap Execution Facility Application for Registration on Form SEF (together with each exhibit thereto, the “SEF Application”) and a cover letter requesting temporary registration and full registration as a swap execution facility pursuant to CFTC Rules 37.3(c) and 37.3(b), respectively. The Applicant submitted one copy of the SEF Application and accompanying cover letter via the CFTC portal.¹

In accordance with CFTC Regulation Section 145.9, MarketAxess SEF Corporation hereby requests that the Confidential Information (as defined below) be accepted and retained in confidence by the Commission. 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 or financial information. We request this confidential treatment for an indefinite period.

Appendix A hereto lists the portions of the SEF Application subject to this request for confidential treatment. These documents are referred to herein as “Confidential Information.”

Pursuant to Section 145.9(d)(4) of the Commission’s regulations, we have marked the first page of each document subject to the request for confidential treatment or the cover page thereof with the words “Confidential Treatment Requested by MarketAxess SEF Corporation.”

¹ The CFTC portal is available at https://forms.cftc.gov/_layouts/Forms/GeneralUploadForm.aspx. The Applicant’s SEF Application was submitted via the CFTC portal in two electronic files. The Confidential Information was submitted in one zip file entitled “MarketAxess SEF Corporation Application – Confidential Submission.” All other information (including all of the documents to be made public) was submitted in a second zip file entitled “MarketAxess SEF Corporation Application – Non-Confidential Submission.”

If any request for the Confidential Information is made, please contact me at your earliest convenience at (212) 813-6280 so that I may provide a detailed written justification of the request for confidential treatment. Please contact me if you have any questions regarding this matter.

Sincerely,



Ron Steinfeld
Chief Compliance Officer

cc: Commodity Futures Trading Commission (Email: secretary@cftc.gov)

Division of Market Oversight (Email: dmosubmissions@cftc.gov)

Richard Shilts
Nancy Markowitz
Amir Zaidi

Appendix A
Confidential Information

Exhibit	Description
A	List of control persons of MarketAxess SEF
B-2	Compensation of directors of MarketAxess SEF
D-2	Addresses for legal service of process
E	Qualifications of MarketAxess SEF's professional employees
F	Staffing requirements of MarketAxess SEF; name and qualifications of each key staff person
H	Pending non-routine legal proceedings
I-1	Statement of Financial Condition of MarketAxess SEF
I-2	Operating costs, financial resources, and sources of operational resources of MarketAxess SEF
J	Financial information of certain MarketAxess SEF affiliates
K	MarketAxess SEF fee schedule
N-1	Regulatory Services Agreement between MarketAxess SEF and the Regulatory Service Provider
N-2	MarketAxess SEF User License Agreement
O-1	Regulatory Service Provider's compliance manual
O-2	MarketAxess SEF in-house compliance functions
P	MarketAxess SEF disciplinary and enforcement procedures; alternative dispute resolution
Q	Functional descriptions of MarketAxess SEF's RFQ and Order Book systems
R	MarketAxess SEF rules prohibiting specific trade practice violations
S	Discussion of how trading data will be maintained
V-1	Technology questionnaire
V-2	Exhibit V attachments