



420 Fifth Avenue, 5<sup>th</sup> Floor  
New York, NY 10018

MAIN 212.393.1913

FAX 212.901.9797

[www.revalsdr.com](http://www.revalsdr.com)

August 13th, 2012

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, DC 20581

**Re: FOIA Request for Confidential Treatment**

Dear Secretary:

Reval SDR, Inc. ("Reval SDR") hereby requests confidential treatment, pursuant to the Commodity Futures Tradition Commission (the "Commission") Regulation 145.9, for the documents listed on Schedule A hereto, submitted to the Commission in connection with Reval SDR's application for Registration as a Swap Data Repository (the "Application") pursuant to Section 21 of the Commodity Exchange Act ("CEA") and Part 49 of the Commission Regulations.

Pursuant to Commission Regulation 145.9(d)(5), Reval SDR requests that confidential treatment be maintained for the documents listed on Schedule A until further notice. We also request that the Commission notify the undersigned immediately after receiving any FOIA request for said documents or any other court order, subpoena or summons for same.

The basis for the request is that disclosure of these documents would reveal trade secrets or confidential commercial information or financial information of Reval SDR.

Pursuant to Commission Regulation 145.9(d)(3), the undersigned may be reached at Reval SDR, Inc., Attn: William F. Greenwood, 420 Fifth Avenue, 5th Floor, New York, NY 10018 at (212) 901-9705.

Very truly yours,

A handwritten signature in black ink, appearing to read "William F. Greenwood".

William F. Greenwood  
Chief, Compliance Officer

Enclosures

cc: [submissions@cftc.gov](mailto:submissions@cftc.gov)



**SCHEDULE A**

**Reval SDR, Inc. – Form SDR – Exhibit M**

Reval SDR, Inc. Pro Forma Financials for 2013 (Attachment 1)

Reval SDR, Inc. Methodology for Measuring Minimum Required Capital under 17 CFR 49.25 – (Attachment 2)

Form and Timing of Regulatory Capital – (Attachment 3)

Capital Provisions – (Attachment 4)