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November 4, 2011

Assistant Secretary of the Commission for FOIA Matters
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Re: Freedom of Information Act ("FOIA") Request for Confidential Treatment

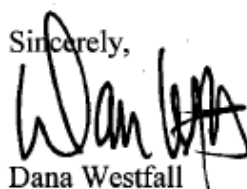
Dear Secretary:

I am writing on behalf of ICE Trade Vault, LLC ("ICE Trade Vault") to request confidential treatment in accordance with Commission Regulation 145.9 for the documents listed on Schedule I hereto, submitted on behalf of ICE Trade Vault to the Commission in connection with ICE Trade Vault's Application for Registration as a Swap Data Repository to Section 21 of the Commodity Exchange Act and Part 49 of the Regulations of the Commission, dated November 4, 2011 (the "Application").

Pursuant to Commission Regulation 145.9(d)(5), ICE Trade Vault requests that confidential treatment be maintained for the documents listed on Schedule I until further notice. ICE Trade Vault also requests that the Commission notify the undersigned immediately after receiving any FOIA request for such documents or any other court order, subpoena or summons for the same. Finally, ICE Trade Vault requests that it be notified in the event the Commission intends to disclose such documents to Congress or to any other governmental agency or unit pursuant to Section 8 of the Commodity Exchange Act, as amended ("CEA"). ICE Trade Vault does not waive its notification rights under Section 8(f) of the CEA with respect to any subpoena or summons for such documents.

The basis for the request is that disclosure of these documents would reveal confidential commercial information, financial information and trade secrets of ICE Trade Vault.

Sincerely,



Dana Westfall

Enclosure

SCHEDULE I

1. Form SDR of ICE Trade Vault, LLC, dated November 4, 2011.
2. Document titled "Composition of, and Fitness Standards for, ICE Trade Vault, LLC's Board of Directors and Advisory Committee," submitted as Confidential Exhibit B-1 to the Application.
3. Document titled "List of ICE Trade Vault, LLC's Board of Directors and Officers," submitted as Confidential Exhibit B-2 to the Application.
4. Document titled "ICE Trade Vault, LLC's Chief Compliance Officer," submitted as Confidential Exhibit C to the Application.
5. Document titled "ICE Trade Vault, LLC Board of Directors Governance Principles," submitted as Confidential Exhibit D to the Application.
6. Document titled "ICE Trade Vault Corporate Governance and Personnel Organization Chart," submitted as Confidential Exhibit E to the Application.
7. Document titled "ICE Trade Vault, LLC Code of Business Conduct and Ethics for Directors," submitted as Confidential Exhibit F-1 to the Application.
8. Document titled "ICE Trade Vault, LLC Code of Business Conduct and Ethics for Committee Members," submitted as Confidential Exhibit F-2 to the Application.
9. Document titled "Code of Business Conduct and Ethics, dated March 2, 2007," submitted as Confidential Exhibit F-3 to the Application.
10. Document titled "ICE Corporate Structure as at 30th September, 2011," submitted as Confidential Exhibit G-1 to the Application.
11. Document titled "Affiliates of ICE Trade Vault, LLC," submitted as Confidential Exhibit G-2 to the Application.
12. Services Agreement, dated as of July 1, 2011, by and between IntercontinentalExchange, Inc. and ICE Trade Vault, LLC, submitted as Confidential Exhibit G-3 to the Application.
13. Software License Agreement, dated as of July 1, 2011, by and between IntercontinentalExchange, Inc. and ICE Trade Vault, LLC, submitted as Confidential Exhibit G-4 to the Application.
14. Document titled "IntercontinentalExchange, Inc.," submitted as Confidential Exhibit G-5 to the Application.
15. Certificate of Formation of ICE Trade Vault, LLC, submitted as Confidential Exhibit H-1 to the Application.
16. Amended and Restated Limited Liability Company Agreement of ICE Trade Vault, LLC, submitted as Confidential Exhibit H-2 to the Application.
17. Certificate of Good Standing of ICE Trade Vault, LLC, submitted as Confidential Exhibit H-3 to the Application.
18. Document titled "ICE Trade Vault Swap Data Repository Rulebook," submitted as Confidential Exhibit J to the Application.
19. Documents titled "ICE Trade Vault, LLC Balance Sheet As Of September 30, 2011," "ICE Trade Vault, LLC Income Statement for the Period Ended September 30, 2011," "ICE Trade Vault,

- LLC Net Asset Calculation September 30, 2011,” and “12-Month Operating Expense Reserve ICE Trade Vault, LLC,” submitted as Confidential Exhibit M to the Application.
20. Document titled “Exhibit O,” containing a description of the ICE Trade Vault fees, submitted as Confidential Exhibit O to the Application.
 21. Document titled “ICE Trade Vault Broker Agreement,” submitted as Confidential Exhibit P-1 to the Application.
 22. Document titled “ICE Trade Vault Trusted Sources Agreement,” submitted as Confidential Exhibit P-2 to the Application.
 23. Document titled “ICE Trade Vault Participant Agreement,” submitted as Confidential Exhibit P-3 to the Application.
 24. Document titled “ICE Trade Vault – Customer User Guide v1.0 October 2011,” submitted as Confidential Exhibit Q-1 to the Application.
 25. Document titled “ICE Trade Vault & ICE eConfirm – eConfirm API Version 5.0 Specification Overview October 2011,” submitted as Confidential Exhibit Q-2 to the Application.
 26. Document titled “ICE Trade Vault Front End & ICE eConfirm Customer User Guide v5.0 October 2011,” submitted as Confidential Exhibit Q-3 to the Application.
 27. Document titled “ICE Trade Vault Front End & ICE eConfirm – Column Headings - File Upload Guide v5.0 October 2011,” submitted as Confidential Exhibit Q-4 to the Application.
 28. Document titled “ICE Trade Vault Front End & ICE eConfirm - Confirmation Procedures Guide October 1, 2011,” submitted as Confidential Exhibit Q-5 to the Application.
 29. Document titled “Trade Registration FixML Reference Manual; FixML Protocol Support Document Version 1.0 September 16, 2011,” submitted as Confidential Exhibit Q-6 to the Application.
 30. Document titled “Qualification Methodology,” submitted as Confidential Exhibit R to the Application.
 31. Document titled “Exhibit S,” containing a description of the services provided by ICE Trade Vault, submitted as Confidential Exhibit S to the Application.
 32. Document titled “Exhibit T,” containing a description of the computer hardware utilized by ICE Trade Vault, submitted as Confidential Exhibit T to the Application.
 33. Document titled “Exhibit U,” containing a description of the ICE Trade Vault personnel qualifications, submitted as Confidential Exhibit U to the Application.
 34. Document titled “Exhibit V,” containing a description of the ICE Trade Vault’s security procedures, submitted as Confidential Exhibit V to the Application.
 35. Document titled “ICE Trade Vault, LLC Business Continuity Plan Version 1.3,” submitted as Confidential Exhibit W to the Application.
 36. Document titled “Exhibit X,” containing a description of ICE Trade Vault’s backup systems, submitted as Confidential Exhibit X to the Application.
 37. Document titled “Exhibit Y,” containing a description of ICE Trade Vault’s system capacity, submitted as Confidential Exhibit Y to the Application.

38. Document titled "ICE Trade Vault, LLC – Exhibit FF-1," containing a description of ICE Trade Vault's compliance with core principles and Commission Regulation 49.19, submitted as Confidential Exhibit FF-1 to the Application.
39. Document titled "ICE SDR Service Disclosure Document," submitted as Confidential Exhibit FF-2 to the Application.
40. Document titled "Corporate Information Security Policy," submitted as Confidential Exhibit GG-1 to the Application.
41. Document titled "Exhibit GG-2," containing a description of ICE Trade Vault's data protection procedures, submitted as Confidential Exhibit GG-2 to the Application.
42. Document titled "Exhibit MM," containing a description of ICE Trade Vault's transition plan, submitted as Confidential Exhibit MM to the Application.