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December 21, 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

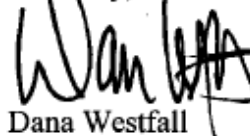
Dear Secretary:

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 Commission staff 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. Letter from Bruce Tupper, Vice President, ICE Trade Vault, LLC to Aravind Menon, CFTC, dated December 21, 2011 (the "Letter").
2. Document titled "Composition of, and Fitness Standards for, ICE Trade Vault, LLC's Board of Directors and Advisory Committee," revised as of December 21, 2011, submitted with the Letter as Confidential Exhibit B-1 to the Application.
3. Document titled "Composition of, and Fitness Standards for, ICE Trade Vault, LLC's Board of Directors and Advisory Committee," revised as of December 21, 2011 and marked to show changes, submitted with the Letter.
4. Document titled "Code of Business Conduct and Ethics," revised as of December 21, 2011, submitted with the Letter as Confidential Exhibit F-3 to the Application.
5. Document titled "Code of Business Conduct and Ethics," revised as of December 21, 2011 and marked to show changes, submitted with the Letter.
6. Document titled "Conflicts of Interest Questionnaire," submitted with the Letter as Confidential Exhibit F-4 to the Application.
7. Document titled "ICE Trade Vault, LLC Cash Flow Statement As Of September 30, 2011," submitted with the Letter as Confidential Exhibit M-1 to the Application.
8. Document titled "12-Month Operating Expenses ICE Trade Vault, LLC," submitted with the Letter as Confidential Exhibit M-2 to the Application.
9. Document titled "Exhibit U," containing a description of the ICE Trade Vault personnel qualifications, revised as of December 21, 2011 and submitted with the Letter as Confidential Exhibit U to the Application.
10. Document titled "Exhibit U," containing a description of the ICE Trade Vault personnel qualifications, revised as of December 21 and marked to show changes, submitted with the Letter.