



Jason Silverstein
Director and Associate General Counsel
Legal Department

January 19, 2012

VIA E-MAIL

Mr. David Stawick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

CONFIDENTIAL TREATMENT
REQUESTED

**RE: SUPPLEMENTAL SUBMISSION NYMEX Submission No. 12-029S:
Additional Supplemental Information Relating to CDS Guaranty
Fund allocation modification. Subject to a Freedom of Information
Act Protection.**

Dear Mr. Stawick:

Previously, pursuant to Submission No. 12-029 dated January 19, 2012, the Chicago Mercantile Exchange, Inc ("CME") notified the Commodity Futures Trading Commission ("Commission") that it planned to modify the allocation of the CDS Guaranty Fund among CDS Clearing Members to be made on the basis of each CDS Clearing Member's potential residual loss ("PRL") (the "Rule Amendments").

In this letter, the CME is providing the Commission with changes to the CDS Manual relating to the Rule Amendments. The additional supplemental information is provided in Appendix A, for which a request for confidential treatment is being simultaneously submitted to the Commission. A copy of that request for confidential treatment is included with this supplemental filing.

CME certifies that the Rule Amendments comply with the Commodity Exchange Act and the regulations thereunder. A concise explanation and analysis of the operation, purpose and effect of the Rule Amendments was provided in Submission No. 12-029. There were no substantive opposing views to this Program.

CME certifies that a description of this submission has been concurrently posted on the NYMEX website at <http://www.cmegroup.com/market-regulation/rule-filings.html>

If you require any additional information regarding this submission, please contact Sasha Rozenberg 212-299-2106 or me at 212-299-2228. Please reference our CME Submission No. 12-029S in any related correspondence.

Sincerely,

/s/ Jason Silverstein
Director and Associate General Counsel

Attachments



Jason Silverstein
Director and Associate General Counsel
Legal Department

January 19, 2012

VIA E-MAIL AND OVERNIGHT MAIL

**CONFIDENTIAL TREATMENT
REQUESTED**

Stacy Easter
Paralegal Specialist
FOIA Compliance Office
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: FOIA Confidential Treatment Request

Dear Ms. Easter:

By e-mail dated today, January 19, 2012, the Chicago Mercantile Exchange, Inc. ("CME") submitted a supplemental rule certification filing (submission No. 12-029S) to the Commodity Futures Trading Commission (the "Commission"). This supplemental filing includes an appendix ("Appendix A"), which is attached.

Pursuant to Sections 8 and 8(a) of the Commodity Exchange Act ("CEA"), as amended, and Commission Regulation 145.9(d), CME requests confidential treatment of Appendix A on the grounds that Appendix A contains confidential commercial information of the submitter (CME). A detailed written justification in support of this request is attached hereto.

Pursuant to Commission Regulation 145.9(d)(5), CME requests that confidential treatment be maintained for Appendix A until further notice from CME. We also request that the Commission notify the undersigned immediately after receiving any FOIA request for said Appendix A or any other court order, subpoena or summons for same. Finally, we request that we be notified in the event the Commission intends to disclose such Appendix A to Congress or to any other governmental agency or unit pursuant to Section 8 of the CEA. CME does not waive its notification rights under Section 8(f) of the CEA with respect to any subpoena or summons for such Appendix A.

Please contact the undersigned at (212) 299-2228 should you have any questions concerning this letter.

Sincerely,

/s/ Jason Silverstein
Director and Associate General Counsel

Enclosure