

trueEX

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October 2, 2013

Via E-Mail: submissions@cftc.gov

Ms. Melissa Jurgens
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

CONFIDENTIAL TREATMENT
REQUESTED

RE: Policies and Procedures regarding trades not accepted for clearing; submission #2013-12.

Dear Ms. Jurgens:

Pursuant to Commodity Futures Trading Commission ("CFTC") Regulation 40.6(a), trueEX LLC ("trueEX" or the "Exchange") self-certifies the Exchange policies and procedures (the "Policies and Procedures") regarding trades executed on the Exchange with the intention to clear but, subsequently, not accepted for clearing (such trades, "Applicable Trades"). The Policies and Procedures are set forth in Exhibit 1 to this letter. Please note that these Policies and Procedures will be made available to all Participants that have executed Participant Documentation and Clearing Firms. As such trueEX is seeking confidential treatment of Exhibit 1 and asks that the CFTC take appropriate steps to keep it confidential and restrict its distribution.

On August 30, 2013 the Exchange filed submission #2013-10, which, in part, added Rule 541(k)¹ to the Exchange rulebook. Rule 541(k) grants the governing board of the Exchange (the "Board") or a designee of the Board the authority to cancel Applicable Trades. The Board or its designee may only exercise the foregoing authority after the Policies and Procedures have been applied to such Applicable Trades. The Exchange has finalized the Policies and Procedures and self-certifies them with the CFTC because they satisfy the definition of "Rules" as that term is defined in CFTC Regulation 40.1.

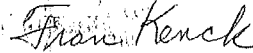
The Policies and Procedures will become effective on October 16, 2013. The Exchange certifies that these Policies and Procedures comply with the requirements of the Commodity Exchange Act and the rules and regulations promulgated thereunder, including, but not limited to, SEF Core Principle 7 and DCM Core Principle 11. There are no

¹ Rule 541 has since been re-numbered to rule 542 as a result of incorporating the rules governing the Exchange's swap execution facility ("SEF") into the Exchange's designated contract market ("DCM") rulebook. In an effort to ensure consistency and avoid ambiguity across Exchange documentation, the Exchange intends to further revise the combined rulebook in the near future such that current rule 542 will be re-numbered back to rule 541.

substantive opposing views that were expressed by Board or committee members, members of the Exchange or market participants that were not incorporated into the Policies and Procedures. The Exchange certifies that this notice has been concurrently posted on the Exchange's Website at <http://www.trueex.com/rules-and-notice>.

If you have questions regarding this notice, please contact me at (312) 320-8934 or by email at fran@trueex.com.

Sincerely,



Fran Kenck
Chief Regulatory Officer
Chief Compliance Officer

cc: dmosubmissions@cftc.gov
submissions@cftc.gov
Roger Smith - Attorney Advisor, DMO
Jonathan Lave - Associate Director, DMO

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Via E-Mail: FOIASubmissions@cftc.gov

CONFIDENTIAL TREATMENT
REQUESTED

Assistant Secretary of the Commission for FOIA Matters
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: FOIA Confidential Treatment Request: Petition Pursuant to Regulation 145.9(d)

To Whom It May Concern:

On this date, trueEX LLC ("trueEX") submitted by e-mail to Roger Smith and Jonathan Lave of the Commodity Futures Trading Commission (the "Commission") and dmosubmissions@cftc.gov and submissions@cftc.gov, Exhibit 1 (referred to as "Confidential Material") as an exhibit to submission #2013-12, which relates to self-certification by trueEX of certain rules.

By this petition, trueEX requests confidential treatment of the Confidential Material pursuant to § 145.9(d) of the Commission's regulations.

Pursuant to Sections 8(a) of the Commodity Exchange Act ("CEA"), and Commission Regulation § 145.9(d), trueEX requests confidential treatment of the Confidential Material on the grounds that disclosure of such materials would reveal trade secrets of trueEX and/or reveal confidential commercial information of trueEX. The Confidential Material is proprietary to trueEX and contain highly sensitive and confidential business and technology information; in addition to violating trueEX's proprietary rights, the disclosure of the Confidential Materials would grant competitors an unfair competitive advantage and/or compromise the competitive advantages possessed by trueEX. Accordingly, trueEX has asked Mr. Smith and Mr. Lave to take appropriate steps to keep Confidential Material submitted to them confidential and to restrict the re-distribution of the Confidential Material.


Pursuant to Commission Regulation § 145.9(d)(5), trueEX hereby requests that the Confidential Material be afforded confidential treatment in perpetuity.

trueEX requests that the Commission notify the undersigned immediately after receiving any FOIA request, any court order, subpoena, or summons seeking to access the Confidential Material in whole or in part. trueEX further requests notification (through the

undersigned) in the event that the Commission intends to disclose the Confidential Material in whole or in part to Congress or to any other governmental agency or unit pursuant to Section 8 of the CEA. trueEX does not waive its notification rights under Section 8(f) of the CEA with respect to any subpoena or summons with respect to the Confidential Material in whole or in part.

Should you have any questions regarding the above, please do not hesitate to contact me by telephone at (312) 320-8934 or by email at fran@trueex.com.

Sincerely,



Fran Kenck
Chief Regulatory Officer

cc: Roger Smith - Attorney Advisor, DMO
Jonathan Lave - Associate Director, DMO