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FOIAsubmissions@cftc.gov
Assistant Secretary of the Commission for FOI,
Privacy and Sunshine Acts Compliance
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581
United States of America

15 August 2012

Re: FOIA CONFIDENTIAL TREATMENT REQUEST

Dear Sir/Madam,

Today the Dubai Mercantile Exchange (“DME”) electronically submitted to the Commodity Futures Trading Commission (the “Commission”) a Foreign Board of Trade Application for Registration (“Form FBOT”). This submission consisted of the Form FBOT, a copy of this petition for confidential treatment, the transmission letter, Supplement S-1, and two files containing the exhibits and attachments to the Form FBOT. One of these files is named “Confidential Submission” and the other is named “Non-Confidential Submission.” By this petition, DME requests confidential treatment pursuant to § 145.9(d) of the Commission’s regulations of all documents included within the file named “Confidential Submission.”

The Confidential Submission consists of the DME’s Shareholders Agreement, Articles of Associations, and three services agreements. These documents are proprietary to DME and contain highly sensitive and confidential business information. Accordingly the DME has asked the Commission to take appropriate steps to keep the Confidential Submission materials confidential and to restrict their re-distribution. The label “Confidential Treatment Requested by DME” appears on each page of the Confidential Submission materials. These documents are attached for your review in a separate appendix.

Pursuant to Sections 8(a) of the Commodity Exchange Act, as amended (“CEA”), and Commission Regulation § 145.9(d), DME requests confidential treatment of the Confidential Submission materials on the grounds that disclosure of such materials would reveal trade secrets and/or confidential commercial and financial information of DME.

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

DME requests that the Commission notify the undersigned immediately after receiving any FOIA request, any court order, subpoena, or summons seeking to access the Confidential Submission materials in whole or in part. DME further requests notification (through the undersigned) in the event the Commission intends to disclose the Confidential Submission materials in whole or in part to Congress or to any other governmental agency or unit pursuant to Section 8 of the CEA. DME 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 Submission materials in whole or in part.

Please contact me using the information below if you have any questions regarding this request for confidential treatment.

Yours sincerely,



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(Enclosures)

cc: Duane Andresen, CFTC

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