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## FOIA CONFIDENTIAL TREATMENT REQUEST

March 24, 2014

Assistant Secretary of the Commission for FOI, Privacy and Sunshine Acts Compliance U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

## **Assistant Secretary:**

This letter hereby withdraws and supersedes our earlier request for confidential treatment, dated August 14, 2012, on behalf of the London Metal Exchange, Ltd. ("LME"), in connection with its application dated August 14, 2012 for registration with the U.S. Commodity Futures Trading Commission (the "Commission") as a Foreign Board of Trade ("FBOT") pursuant to Section 4(b) of the Commodity Exchange Act and Part 48 of the Commission's regulations.

On behalf of the London Metal Exchange, Ltd. ("LME"), we hereby clarify our request that the Commission accord confidential treatment under the Freedom of Information Act (the "FOIA") to the *non-public, confidential information* attached to the August 14, 2012 request, including Tabs 30h and 32, Bates-stamped LME-003920 through LME-003932 and LME-004016 through LME-004022, respectively, attached thereto, and all information derived therefrom (the "Confidential Information"). We request that confidential treatment be afforded as long as the Commission retains the Confidential Information. In accordance with the Commission's FOIA regulations, the Confidential Information bears the designation "Confidential Treatment Requested by London Metal Exchange, Ltd."

This request for confidential treatment under the FOIA is made pursuant to 17 C.F.R. § 145.9(d), as the Confidential Information contains information that would reveal LME's trade secrets or confidential commercial or financial information. This request is not to be construed as a waiver of any other protection from disclosure or confidential treatment accorded by law, and LME will rely on and invoke any such confidentiality protection.

LME requests that the Commission advise the undersigned, its representative, in advance of any disclosure of the Confidential Information pursuant to the FOIA so that this request for confidential treatment may be further substantiated.

LME further requests that if any of the Confidential Information is to be disclosed to Congress or any other federal or state governmental agency or department, a request for confidential treatment be made by the Commission on LME's behalf, or that we be permitted to make such a request directly.

Respectfully Submitted,

Edward J. Rosen

cc: Melissa Jurgens, Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street NW
Washington, DC 20581