

**VIA EMAIL TO: [FOIAsubmissions@CFTC.gov](mailto:FOIAsubmissions@CFTC.gov)**

12 February 2019

Commodity Futures Trading Commission  
Attention: FOIA Compliance Office  
Three Lafayette Centre  
1155 21<sup>st</sup> Street NW  
Washington DC 20581

**RE: FOIA Request for Confidential Treatment**

Dear Sir/Madam,

In accordance with Commission Regulation 145.9(d), LCH Limited ("LCH") respectfully requests confidential treatment under the Freedom of Information Act (the "FOIA"), 5 U.S.C. §552, for Appendix A of the LCH portal submission on 12 February 2019, titled "Margin Collateral Haircut Change", including subsequent emails and replies between LCH and Commission Staff (the "Information").

LCH is requesting confidential treatment for the Information pursuant to Commission regulation 145.9(d)(ii) which provides that confidential treatment may be requested on the grounds that disclosure would reveal trade secrets, confidential commercial or financial information. LCH further requests that the Information receives confidential treatment in perpetuity.

This request is not to be construed as a waiver or any other protection from disclosure or confidential treatment accorded by law, and LCH will rely on and invoke any such confidentiality protection. LCH requests notification from the Commission in advance of any disclosure of the Information, pursuant to the FOIA or the Commission's Rules of Practice, so that this request for confidential treatment may be substantiated.

Yours faithfully,



Denise Holder  
Regulatory Advisor  
[denise.holder@lch.com](mailto:denise.holder@lch.com)