



23 March 2017

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

Dear Sir / Madam,

FOIA Confidential Treatment Request for SGX-DC

1. Singapore Exchange Derivatives Clearing Limited (the "**Requesting Party**") hereby respectfully requests confidential treatment in accordance with Commodity Futures Trading Commission ("**Commission**") regulation 145.9 of Appendix A (Confidential) to a Commission Regulation 40.6 submission filed with the Commission on 23 March 2017 (the "**Confidential Information**").
2. The submission is in respect of amendments to the Over-The-Counter Financial Derivatives ("**OTCF**") Clearing Member Handbook ("**Handbook**").
3. This request for confidential treatment is made pursuant to Commission regulation 145.9(d)(1) because the Requesting Party believes that the Confidential Information is covered by one or more exemptions in the Freedom of Information Act (the "**FOIA**") (5 U.S.C. §552(b)) and is therefore exempt from the Commission's public disclosure requirements. In particular, 5 U.S.C. §552(b)(4) and Commission regulation 145.9(d)(1)(ii) exempt disclosure that would reveal the Requesting Party's trade secrets or confidential commercial or financial information. Requesting Party believes that the Confidential Information contains confidential commercial information as well as proprietary information regarding business procedures and systems that should be protected from public disclosure.
4. In this regard, we bring to the Commission's attention that the Handbook was the subject of a confidential treatment request in letter dated 28 June 2013 in respect of Request Party's application to be a derivatives clearing organization.
5. This request is not to be construed as a waiver of any other protection from disclosure or confidential treatment accorded by law and the Requesting Party will rely on and invoke any such confidentiality protection. The Requesting Party requests that the Commission advise the undersigned, pursuant to Commission regulation 145.9(e)(1),

Singapore Exchange Derivatives Clearing Limited
Company Reg No. 200005878M
(A wholly-owned subsidiary of Singapore Exchange Limited)

2 Shenton Way, #02-02 SGX Centre 1, Singapore 068804
main: +65 6236 8888 fax: +65 6535 0775
sgx.com

in advance of any disclosure of the Confidential Information pursuant to the FOIA, so that this request for confidential treatment may be substantiated. The undersigned should be contacted if you require substantiation of this request for confidential treatment.

6. Please do not hesitate to contact the undersigned at kahmun.huay@sgx.com or +65 6713 6504 should you require any clarification.

Yours sincerely,



Huay Kah Mun
Senior Associate
Regulatory Development and Policy (Regulation)