



## **CFTC FOIA CONFIDENTIAL TREATMENT REQUEST**

**TO:** **CFTC FOIA COMPLIANCE OFFICE**  
U.S. Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, NW  
Washington, DC 20581

**FROM:** **THE OPTIONS CLEARING CORPORATION**  
Legal Department  
125 South Franklin Street, Suite 1200  
Chicago, Illinois 60606  
(312) 322-6200

**BY:** Justin Byrne, Vice President, Regulatory Filings

**DATE:** 2020-06-09

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Pursuant to the Freedom of Information Act and the rules of the U.S. Commodity Futures Trading Commission (“Commission”) implementing FOIA, The Options Clearing Corporation (“OCC”) hereby requests confidential treatment for the record(s) (“Record(s)”) identified below:

### **RECORD(S) FOR WHICH CONFIDENTIAL TREATMENT IS REQUESTED:**

- A 51-page document titled, “OCC Data and Supporting Analysis for Liquidity Risk Management Proposal,” which is attached to SR-OCC-2020-003 as Exhibit 3.
- A 16-page document titled, “Liquidity Risk Management Framework,” which is attached to SR-OCC-2020-003 as Exhibit 5B.
- A 48-page document titled, “Comprehensive Stress Testing & Clearing Fund Methodology, and Liquidity Risk Management Description,” which is attached to SR-OCC-2020-003 Exhibit 5C.
- A 21-page document titled, “Risk Management Framework Policy,” which is attached to SR-OCC-2020-003 as Exhibit 5D.
- A 15-page document titled, “Clearing Fund Methodology Policy,” which is attached to SR-OCC-2020-003 as Exhibit 5E.
- An 11-page document titled, “Collateral Risk Management Policy,” which is attached to SR-OCC-2020-003 as Exhibit 5F.
- A 12-page document titled, “Counterparty Credit Risk Management Policy,” which is attached to SR-OCC-2020-003 as Exhibit 5G.
- A 10-page document titled, “Default Management Policy,” which is attached to SR-OCC-2020-003 as Exhibit 5H.

**BASIS:**

- Business confidentiality - The Record(s) contain(s) contain the trade secrets or confidential commercial or financial information of a self-regulatory organization and are being provided to the Commission's staff in response to a request made pursuant to the Commission's oversight authority. OCC's request for confidential treatment extends to any derivative works (regardless of media) containing the above described Record(s) or otherwise based thereon.

*FOIA Notice: 2020-06-09*