

22nd September 2017

US Commodity Futures Trading Commission
Attention: FOIA Compliance Office
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

RE: FOIA Request for Confidential Treatment

Dear Sir/Madam:

In accordance with Commission Regulation 145.9(d), LCH SA ("**LCH**") respectfully requests confidential treatment under the Freedom of Information Act (the "**FOIA**"), 5 U.S.C. § 552, for the following documents: **CDS Dispute Resolution Protocol, Reference Guide, CDS Margin Framework** (version 3.6) and **CDSClear Default Fund Methodology** (version 1.4) that are attached to the appropriate self-certification submissions filed on 22nd September 2017, including appendices, memos, subsequent emails and replies between LCH and Commission staff, regarding proposed amendments to LCH CDSClear Credit Index Options initiative (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 or 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 of 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 sincerely,



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