

23 September 2020

**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 LCH SA documents all together attached to the self-certification submission filed on September 23, 2020: **LCH Group Risk Policy: Financial Resource Adequacy, LCH Group Risk Policy: Collateral Risk, LCH Group Risk Policy: Counterparty Credit Risk, LCH SA Reference Guide: CDS Margin Framework and CDSClear Default Fund Methodology** (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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