



October 31, 2019

(Submitted via the CFTC Portal)

Assistant Secretary of the Commission  
FOIA, Privacy and Sunshine Act Compliance  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, N.W.  
Washington, D.C. 20851

**RE: FOIA Request for Confidential Treatment**

Dear Sir or Madam:

The Minneapolis Grain Exchange, Inc. ("MGEX") has submitted to the Commission a Rule Certification Submission pursuant to CFTC Regulation 40.6(a) for the implementation of SPIKES Market Maker Program (hereinafter referred to as the "Confidential Submission" or "Program"). This Confidential Submission included as Exhibit A contains confidential commercial or financial information. MGEX respectfully requests that the Commission not release the Confidential Submission.

MGEX specifically requests confidential treatment of the Confidential Submission pursuant to Commission Regulations 145.9 and 145.5. Under Commission Regulation 145.9, a submitter making this request "shall specify the grounds on which confidential treatment is being requested." Confidential treatment is being sought on the basis that the Confidential Submission contains confidential commercial or financial information under Commission Regulation 145.9(d)(1)(ii). In addition, MGEX represents that the Confidential Submission is a nonpublic record pursuant to Commission Regulation 145.5.

In accordance with Commission Regulation 145.9(d)(5), MGEX asks the Commission to afford confidential treatment to the Confidential Submission in perpetuity.

Should the Commission receive a Freedom of Information Request for the Confidential Submission, MGEX acknowledges that it will be notified of the request and then instructed to provide a detailed written justification for confidential treatment, per Commission Regulation 145.9(e)(1).

\* \* \* \* \*

If there are any questions regarding this request, please contact me at (612) 321-7128 or [psparby@mgex.com](mailto:psparby@mgex.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "Peter D. Sparby". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Peter D. Sparby  
Associate Corporate Counsel

Enclosure