



ICAP GLOBAL DERIVATIVES LIMITED  
2 Broadgate  
London  
EC2M 7UR  
United Kingdom

December 12, 2016

**Via Email**

Assistant Secretary of the Commission for  
FOI, Privacy and Sunshine Acts  
Compliance  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, NW  
Washington, D.C. 20581  
Via email: [FOIAsubmissions@cftc.gov](mailto:FOIAsubmissions@cftc.gov)

**Re: FOIA Confidential Treatment Request**

Ladies and Gentlemen:

ICAP Global Derivatives Limited ("IGDL") ("**Applicant**") has submitted to the Commodity Futures Trading Commission ("**Commission**") a rule certification in IGDL-2016-R-16 pursuant to CFTC Reg. 40.6 in order to certify its revised trade execution fee schedule (the "**Certification**"). Attached as Exhibit A to the Certification is the revised fee schedule (the "**Fee Schedule**") and attached as Exhibit B to the Certification is a marked version of the Fee Schedule showing all changes to the last version submitted to the Commission. Attached as Exhibit C to the Certification is a revised discount appendix (the "**Discount Appendix**") and attached as Exhibit D to the Certification is a marked version of the Discount Appendix showing all changes to the last version submitted to the Commission.

The Applicant hereby requests that Exhibit A, Exhibit B, Exhibit C and Exhibit D to the Certification ("**Confidential Information**") be treated as confidential in order to prevent disclosure of Applicant's trade secrets and confidential commercial and financial information upon a request under the Freedom of Information Act ("**FOIA**"). We request the Confidential Information be provided confidential treatment for an indefinite period.

Please promptly inform the following of any request for the Confidential Information or its contents made pursuant to FOIA or the Commission's rules so that we may substantiate the foregoing request for confidential treatment in accordance with Section 145.9 of the Commission's Regulations: Attention: General Counsel, ICAP GLOBAL DERIVATIVES LIMITED, 2 Broadgate, London EC2M 7UR, United Kingdom.

Pursuant to Part 145.9(d)(4) of the Commission's regulations, we have marked each page of the Confidential Information with the words "Confidential Treatment Requested by ICAP GLOBAL DERIVATIVES LIMITED" and have identified each portion of the Confidential Information with

the following identifying numbers and codes, as applicable: IGDL-2016-R-16-Exhibit A, IGDL-2016-R-16-Exhibit B, IGDL-2016-R-16-Exhibit C, and IGDL-2016-R-16-Exhibit D.

Please contact the undersigned at 212-341-9193 with any questions regarding this matter.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Gregory Compa', is positioned above the typed name and title.

Gregory Compa, Chief Compliance Officer  
**ICAP GLOBAL DERIVATIVES LIMITED**  
2 Broadgate  
London  
EC2M 7UR  
United Kingdom

cc by email: Division of Market Oversight, Commodity Futures  
Trading Commission