



**KANSAS CITY
BOARD OF TRADE
CLEARING CORPORATION**

April 20, 2012

SENT VIA E-MAIL

Assistant Secretary of the Commission for FOI,
Privacy & Sunshine Acts Compliance
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: FOIA Confidential Treatment Request

Dear FOIA Compliance:

The Kansas City Board of Trade Clearing Corporation ("KCBTCC") hereby petitions, pursuant to the Freedom of Information Act, 5 U.S.C. 552 (Commission Regulation Section 145.9), that the attached information regarding the KCBTCC Risk Management Policies be retained and treated as "confidential" information and protected from requests to review such information pursuant to the Freedom of Information Act ("FOIA"). KCBTCC further requests that the information subject to this confidential treatment request remain confidential until such time as KCBTCC notifies the Commission in writing of its intent to no longer have the confidentiality of such information protected pursuant to the above FOIA regulations.

The basis for this petition for confidential treatment is Commission Regulation Section 145.9(d)(1)(ii). Disclosure of such information provided by KCBTCC would reveal financial, operational and procedural information considered trade secrets and confidential commercial and financial information. KCBTCC is requesting confidential treatment of the entire document.

In the event a FOIA request for such information is filed, please contact me at 816-931-8964.

Sincerely,

Charles Savage
Assistant Vice President & Manager



**KANSAS CITY
BOARD OF TRADE**

CLEARING CORPORATION

April 20, 2012

SENT VIA AGENCY WEBSITE

Mr. David Stawick
Secretary of the Commission
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: Submission Pursuant to CFTC Regulation Section 40.6(a)

Dear Mr. Stawick:

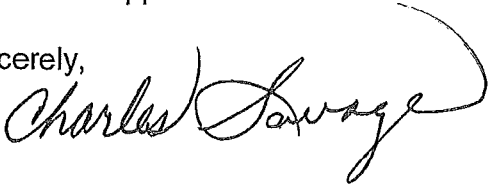
- I. **Certification.** The Kansas City Board of Trade Clearing Corporation ("KCBTCC") hereby gives notification to the Commission pursuant to Commission Regulation Section 40.6(a), of its Risk Management Policies. The KCBTCC Board of Directors, in a regular meeting held on April 17, 2012, unanimously approved KCBTCC Risk Management Policies. KCBTCC certifies to the Commission that to the best of its knowledge the provisions of KCBTCC Risk Management Policies are in compliance with the Commodity Exchange Act and the regulations thereunder.
- II. **Date of Implementation.** KCBTCC intends to implement KCBTCC Risk Management Policies on Monday, May 7, 2012.
- III. **Substantive Opposing Views.** To the knowledge of the Board of Directors and staff, no substantive opposing views were expressed by members or others regarding KCBTCC Risk Management Policies.
- IV. **Text of KCBT Risk Management Policies:** See Appendix A.
- V. **Rationale for Action Taken.** KCBTCC Risk Management Policies are being submitted to the Commission in order for KCBTCC to be in compliance with Commission Regulations that require a DCO to submit to the Commission any new rule or rule amendment that impacts the rights and obligations of the DCO, its clearing members, or other market participants in connection with the clearing activities of the DCO. Regulation 40.1(i) defines the term "rule" broadly as follows: "any

constitutional provision, article of incorporation, bylaw, rule, regulation, resolution, interpretation, stated policy, advisory, terms and conditions, trading protocol, agreement or instrument corresponding thereto, including those that authorize a response or establish standards for responding to a specific emergency, and any amendment or addition thereto or repeal thereof, made or issued by a [DCO] or by the governing board thereof or any committee thereof, in whatever form adopted." The proposed risk management policies are in compliance with applicable provisions of the Act, including core principles and the Commission's regulations thereunder.

- VI. **Closing.** Any questions regarding this submission should be directed to the undersigned at 816-931-8964 or csavage@kcbt.com.

KCBTCC certifies that it has posted a notice of pending certification with the Commission and a copy of the submission, concurrent with the filing of the submission with the Commission on our website, thereby providing public notice. The link to the posting is [http://www.kcbt.com/rule book kcbtcc.html](http://www.kcbt.com/rule%20book%20kcbtcc.html). KCBTCC has separately requested confidential treatment pursuant to the Freedom of Information Act, 5 U.S.C. 552, regarding KCBTCC Risk Management Policies as set forth in Appendix A.

Sincerely,

A handwritten signature in cursive script that reads "Charles Savage". The signature is written in black ink and is positioned below the word "Sincerely,".

Charles Savage
Assistant Vice President & Manager