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OFFICE OF THE
SECRETARIAT

July 13, 2011

VIA E-MAIL

Mr. David Stawick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
11555 21st Street, N.W.
Washington, D.C. 20581

**CONFIDENTIAL TREATMENT
REQUESTED**

**RE: Amendment to CME Rules 8G802.C and Chapters 2, 4, 5, 6 and 7 of
the IRS Manual.
CME Submission No. 11-280R**

Dear Mr. Stadwick:

Chicago Mercantile Exchange Inc. ("CME" or "Exchange") hereby notifies the Commodity Futures Trading Commission of amendments to Rule 8G802.C and Chapters 2, 4, 5, 6 and 7 of the Manual of Operations for CME Cleared Interest Rate Swaps (the "IRS Manual") as follows:

Amendments to IRS Manual:

- Chapter 2 – Updated product attributes and removed sample confirmation message;
- Chapter 4 – Amended to provide for netting of swaps containing stub periods with the same start and end dates;
- Chapter 5 – Changes to operational timeline and addition of enhanced daily reports;
- Chapter 6 – Removal of acceptable collateral table and addition of reference to website; and
- Chapter 7 – Change in margin methodology from PCA methodology to HVaR methodology.

Amendment to 8G802.C

- Clarifies that the IRs advance assessment authority includes hedging contracts entered into by the Clearing House and provides that the calculation is based on the performance bond calculation methodology.

The text of the rule amendments are attached, with additions underscored and deletions lined-out. The amendments will be made effective on Friday, July 15, 2011.

CME certifies that the amendments comply with the Commodity Exchange Act and regulations thereunder. There were no substantive opposing views to this proposal.

Clearing House Risk, at (312) 930-3162 or me at 212-299-2228. Please reference CME Submission No. 11-280R in any related correspondence.

Sincerely,

/s/ Jason Silverstein
Director & Associate General Counsel

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**CONFIDENTIAL TREATMENT
REQUESTED**

August 4, 2011

VIA ELECTRONIC MAIL AND OVERNIGHT MAIL

Assistant Secretary of the Commission for FOI, Privacy and Sunshine Act Compliance
Commodity Futures Trading Commission
FOIA Compliance Office
Three Lafayette Centre
1155 21st Street, NW
Washington, D.C. 20581

RE: FOIA Confidential Treatment Request

Dear FOIA Compliance Staff:

The Chicago Mercantile Exchange, Inc. (the "Exchange") submitted to the Commodity Futures Trading Commission (the "Commission") rule filings on July 13, 2011 (CME Submission No. 11-280) (the "Rule Submission") relating to CME Rules 8G802.C and Chapters 2, 4, 5, 6 and 7 of the Manual of Operations for CME Cleared Interest Rate Swaps (the "IRS Manual"). The IRS Manual submitted in the Rule Submission contains information that is a trade secret and confidential commercial information of the Exchange.

Accordingly, pursuant to Sections 8 and 8(a) of the Commodity Exchange Act, as amended, ("CEA") and Commission Regulation 145.9(d), the Exchange requests confidential treatment of the IRS Manual (the "Confidential Information") on the grounds that the disclosure of the information contained therein would reveal trade secrets and confidential commercial information of the submitter. The Exchange hereby encloses CME Submission No.11-280R submitting the original Rule Submission with the IRS Manual redacted and segregated with appropriate legend requesting confidential treatment.

Pursuant to Commission Regulation 145.9(d)(1)(ii), the Exchange requests that confidential treatment be maintained for the Confidential Information until further notice from the Exchange.

FOIA Compliance Staff

August 4, 2011

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The Exchange also requests that the Commission notify the undersigned immediately upon receipt of any FOIA request for the Confidential Information or any court order, subpoena or summons for same. Finally, the Exchange requests immediate notification in the event the Commission intends to disclose the Confidential Information to Congress or to any other governmental agency or unit pursuant to Section 8 of the CEA. The Exchange does not waive its notification rights under Section 8(f) of the CEA with respect to any court order, subpoena or summons for the Confidential Information.

Please contact the undersigned at (212) 299-2228 should you have any questions concerning this letter.

Very truly yours,

/s/ Jason S. Silverstein
Director & Associate General Counsel

Enclosure

cc: John C. Lawton, Deputy Director and Chief Counsel, Division of Clearing and Intermediary Oversight

CME Rule 8G802.C (Limited Advance Assessment Authority)

8G802.C. Limited Advance Assessment Authority

If a default occurs and the collateral for IRS Contracts of the defaulted IRS Clearing Member (including any IRS Contracts entered into by the Clearing House to hedge such defaulted Clearing Members' IRS Contracts) held by the Clearing House (after taking into account settlement variation payment obligations) is less than 50 percent of the initial-performance bond requirement for IRS Contracts calculated using the performance bond methodology at the time of default, the Clearing House may issue an advance assessment demand to non-defaulted IRS Clearing Members to contribute capital up to a maximum of the amount that would be necessary to bring the collateral of the defaulted IRS Clearing Member to 100% of the relevant requirement. Any such assessment shall be subject to any cap on assessments pursuant to Rule 8G802.B and shall be made pro rata among IRS Clearing Members on the same basis as assessments under Rule 8G802.B."

Manual of Operations for CME Cleared Interest Rate Swaps

CONFIDENTIAL

[Redacted]