

September 18, 2020

Via email to FOIAsubmissions@cftc.gov

Assistant Secretary of the Commission for FOIA
Privacy and Sunshine Acts Compliance
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581

Re: FOIA Confidential Treatment Request of Appendices A to C

Dear Assistant Secretary:

TW SEF LLC ("TW SEF") hereby requests that the U.S. Commodity Futures Trading Commission (the "Commission") accord confidential treatment under the Freedom of Information Act (the "FOIA") to the attached appendices ("Appendices A to C") which were submitted to the Commission on this date. This request pertains to all material in Appendices A to C, and additional redacted versions of Appendices A to C are included with this submission. TW SEF requests that confidential treatment be afforded as long as the Commission retains Appendices A to C. In accordance with the Commission's FOIA regulations, Appendices A to C bear the designation "Confidential Treatment Requested by TW SEF LLC."

This request for confidential treatment under the FOIA is made pursuant to Commission Regulations 40.8 and 145.9(d), as Appendices A to C contain information that would reveal the trade secrets or confidential commercial or financial information of TW SEF and its affiliates. As required by Commission Regulation 40.8(c)(1), TW SEF has submitted, together with this request, a detailed written justification in support of the confidentiality of Appendices A to C.

This request shall not be construed as a waiver of any protection from disclosure or confidential treatment under Commission Regulations or any other protection from disclosure or confidential treatment accorded by law, and TW SEF will rely on and invoke any such confidentiality protection with respect to Appendices A to C. TW SEF requests that the Commission advise the undersigned, its representative, in advance of any disclosure of Appendices A to C pursuant to the FOIA so that this request for confidential treatment may be further substantiated. TW SEF further requests that if any of the Confidential Information is to be disclosed to Congress or any other federal or state governmental agency or department, a request for confidential treatment be made by the Commission on TW SEF's behalf, or that we be permitted to make such a request directly.

If you have any questions, please do not hesitate to contact the undersigned at 646-560-7223 or by email at Gregory.Compa@tradeweb.com.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Gregory Compa".

Gregory Compa
Chief Compliance Officer
TW SEF LLC

APPENDIX A

Fully Integrated API Services Fee Schedule (GBP Swaps)

(Blackline and Clean Copies)

[REDACTED]

APPENDIX B

Fully Integrated API Services Fee Schedule (EMEA Swaps)

(Blackline and Clean Versions)

[REDACTED]

APPENDIX C

Fully Integrated API Services Fee Schedule (Regional Rate Swaps Currencies)

(Blackline and Clean Versions)

[REDACTED]