

SUBMISSION COVER SHEET

Registered Entity Identifier Code (optional)

Date:

IMPORTANT: CHECK BOX IF CONFIDENTIAL TREATMENT IS REQUESTED.

ORGANIZATION

FILING AS A: **DCM** **SEF** **DCO** **SDR** **ECM/SPDC**

TYPE OF FILING

- **Rules and Rule Amendments**

- Certification under § 40.6 (a) or § 41.24 (a)
- “Non-Material Agricultural Rule Change” under § 40.4 (b)(5)
- Notification under § 40.6 (d)
- Request for Approval under § 40.4 (a) or § 40.5 (a)
- Made Available To Trade Determination under § 40.5 or § 40.6
- Advance Notice of SIDCO Rule Change under § 40.10 (a)

- **Products**

- Certification under § 40.2 (a) or § 41.23 (a)
- Submission under § 39.5
- Swap Class Certification under § 40.2 (d)
- Request for Approval under § 40.3 (a)
- Novel Derivative Product Notification under § 40.12 (a)

RULE NUMBERS

DESCRIPTION

ADDRESS
55 Water Street
New York, NY 10041

CONTACT
phone 212.968.4100
fax 212.968.2386

INTERNET
www.Gfigroup.com



December 10, 2013

VIA EMAIL (submissions@cftc.gov)

Ms. Melissa Jurgens
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: *Supplemental Submission*
Submission no. 13-0007S: Additional Information Regarding the Markit CDX
Market Maker Program.
Subject to Freedom of Information Act Protection.

Dear Ms. Jurgens:

Pursuant to rule filing number 13-0007 submitted on December 4th, GFI Swaps Exchange LLC ("GFI") notified the staff of the Commodity Futures Trading Commission (the "Staff") of plans to implement the Markit CDX Market Maker Incentive Program. (the "Program").

By this letter, GFI is providing the Staff with certain additional information and details regarding the Program as contained in Appendix A. Please be advised that a request for confidential treatment has been submitted to the Commission under separate cover. A copy of the request is included with this supplemental filing.

GFI hereby certifies that the Program as contained in this supplemental submission and Submission number 13-0007 complies with the Commodity Exchange Act and the regulations promulgated thereunder. There were no substantive opposing views to the Program. A copy of this submission is available on GFI's website at www.gfigroup.com.

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55 Water Street
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Please feel free to contact me if you require any additional information regarding this submission.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Daniel Glatter', written over a horizontal line.

Daniel Glatter
Vice President and
Assistant General Counsel

Cc: William Shields
CCO, GFI Swaps Exchange LLC

Att.

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55 Water Street
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December 10, 2013

FOIA CONFIDENTIAL TREATMENT REQUEST
Pursuant to 17 C.F.R. § 145.9

VIA EMAIL (FOIAsubmissions@cftc.gov)
Assistant Secretary of the Commission for FOI,
Privacy and Sunshine Acts Compliance
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: Petition for Confidential Treatment

Dear Sir or Madam:

GFI Swaps Exchange LLC ("GFI") has on this date provided the material described in Appendix A to this letter (the "Confidential Submission") to the Commission and staff of the Division of Market Oversight.

In accordance with the provisions of Commission Regulations 145.5 and 145.9, we hereby request confidential treatment of the Confidential Submission. Confidential treatment is requested, inter alia, on the grounds that the Confidential Submission contains data and information which would separately disclose business transactions and trade secrets that may not be disclosed to third parties, as provided in Section 8(a) of the Commodity Exchange Act and Commission Regulation 145.5(c)(1). Confidential treatment additionally is requested on the grounds that the Confidential Submission is exempt from disclosure under paragraph (b)(4) of the Freedom of Information Act ("FOIA") and Commission Regulations 145.5(d) and 145.9(d)(1)(ii) because it contains commercial and financial information that is confidential and would be of material assistance to competitors of GFI.

In accordance with the provisions of paragraph (d)(5) of Regulation 145.9, we request that the Confidential Submission be afforded confidential treatment in perpetuity.

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55 Water Street
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We understand that if the Commission receives a FOIA request for the Confidential Submission, we will be notified of such request in accordance with the Commission's regulations and be asked to submit, within ten business days, a detailed written justification for confidential treatment of the Confidential Submission. See Commission Regulation § 149.5(e)(1); see also Executive Order 12600, 52 Fed. Reg. 23781 (June 23, 1987) (detailing pre-disclosure notification procedures under FOIA). In such event, we request that Commission staff telephone or email the undersigned rather rely upon United States mail for such notice.

If the Commission or its staff transmits any of the Confidential Submission to another federal agency, we request that you forward a copy of this letter to any such agency with the Confidential Submission and further request that you advise any such agency that GFI has requested that this material be accorded confidential treatment.

The request set forth in the preceding paragraphs also apply to any memoranda, notes, transcripts or other writings of any sort whatsoever that are made by, or at the request of, any employee of the Commission (or any other federal agency) and which (1) incorporate, include or relate to any aspect of the Confidential Submission; or (2) refer to any conference, meeting, or telephone conversation between GFI, its current or former employees, representatives, agents, auditors or counsel on the one hand and employees of the Commission (or any other government agency) on the other, relating to the Confidential Submission.

Any questions regarding this request for the Confidential Treatment, as well as any notices pursuant to Commission Regulation § 145.9(e), should be directed to the attention of the undersigned at the addresses and telephone number provided herein.

ADDRESS
55 Water Street
New York, NY 10043

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phone 212.968.4100
fax 212.968.2366

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Should you have any questions, or receive any requests for copies of the enclosed, please contact the undersigned at (212) 968-2982 or daniel.glatter@gfigroup.com.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Daniel Glatter', written over a horizontal line.

Daniel Glatter
Vice President and Assistant Secretary
GFI Swaps Exchange LLC

Enclosure