



FOIA CONFIDENTIAL TREATMENT REQUESTED BY
AUSTRALIA AND NEW ZEALAND BANKING GROUP LIMITED

Via Agency Website Comments Online process

Commodity Futures Trading Commission

Office of Information and Regulatory Affairs, Office of Management and Budget

Attn: Desk Officer for the Commodity Futures Trading Commission

Attn: Dana Brown, Division of Market Oversight

Three Lafayette Centre

1155 21st Street, N.W.

Washington, DC 20581

18 December 2014

**Re: "Large Trader Reporting for Physical Commodity Swaps," OMB Control No. 3038-0095 -
Extension**

Dear Sir/Madam,

Enclosed please find a submission to the Agency Information Collection Activities under OMB Review for "Large Trader Reporting for Physical Commodity Swaps," OMB Control No. 3038-0095 – Extension.

Pursuant to Sections 8 and 8(a) of the Commodity Exchange Act, as amended, and Commission Regulation § 145.9, Australia and New Zealand Banking Group Limited ("ANZ") requests confidential treatment of this letter on the ground that disclosure of the letter would reveal trade secrets or confidential commercial or financial information of ANZ, or protected personal information.

Pursuant to 28 C.F.R. § 16.8(c), ANZ further requests that neither the existence nor the contents of this letter be disclosed in response to any request under the Freedom of Information Act, 5 U.S.C. § 552. In the event that this letter, or any portion thereof, is the subject of a Freedom of Information Act request, please inform me, and I will provide further substantiation of ANZ's request for confidential treatment.

ANZ is seeking confidential treatment of this letter for an indefinite period of time.

ANZ is an Australian-incorporated bank that is active in domestic and international markets. ANZ is registered with the Commodity Futures Trading Commission as a non-U.S. swap dealer, and as such, produces a Large Trader Report ("LTR") on a daily basis.

As a non-financial institution that does a relatively limited amount of commodities trading with U.S.-based institutions, ANZ registered as a non-U.S. swap dealer in January 2013 in order to ensure it complied with newly enacted U.S. regulations.

The burden of the collection of information in the LTRs for ANZ is estimated as follows:

Type of cost	Australian \$	Examples
Fixed – Development	1.7 million	Developing, testing, enhancing, running the report
Fixed – Future development	232,000	Future development, including monitoring and controls – e.g. end to end review, automating daily price checks
Ongoing	43,000	Running the report, including daily checks and follow-ups; Regular maintenance activities including disaster recovery and business continuity checks

Please contact Gregory Haynes at Gregory.Haynes@anz.com or Antonia Fong at Antonia.Fong2@anz.com if you have any questions.

Yours faithfully



Gregory Haynes
Director OTC Reform