

BSDR LLC  
731 Lexington Avenue  
New York, NY 10022

March 14, 2013

**FOIA CONFIDENTIAL TREATMENT REQUEST**

Submitted via overnight mail

Assistant Secretary of the Commission for FOIA, Privacy and Sunshine Acts Compliance  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, N.W.  
Washington, D.C. 20581

Re: Freedom of Information Act ("FOIA") Confidential Treatment Request for Information Submitted to the Commodity Futures Trading Commission ("Commission") Pursuant to Section 21 of the Commodity Exchange Act and Part 49 of the Regulations of the Commission, by BSDR LLC, as proposed operator of a swap data repository

Ladies and Gentlemen:

We refer to the FOIA Confidential Treatment Request of BSDR LLC dated March 8, 2013 (the "Original FOIA Request").

BSDR LLC, as proposed operator of a swap data repository, submitted to the Commission a Swap Data Repository Application for Registration on Form SDR dated March 8, 2013 (the "SDR Application"), an Operational Capability Technology Questionnaire (the "Technology Questionnaire") and a cover letter dated March 8, 2013 (the "Original Cover Letter" and, together with the SDR Application and the Technology Questionnaire, the "Application"). The Applicant submitted one copy of the Application via email to submissions@cftc.gov and to dmosubmissions@cftc.gov on March 9, 2013 and, for convenience, six paper copies of the Application via overnight mail to the attention of Ms. Abigail Knauff.

BSDR LLC submitted the Original FOIA Request contemporaneously with the Application. This FOIA Confidential Treatment Request supersedes the Original FOIA Request.

BSDR LLC hereby requests that the Confidential Information (as defined below) be accorded confidential treatment on the grounds that it would reveal BSDR LLC's trade secrets and confidential commercial or financial information. We request this confidential treatment for an indefinite period.

Please promptly inform the following of any request for the Confidential Information or its contents made pursuant to FOIA or the Commission's rules so that we may substantiate the foregoing request for confidential treatment in accordance with Part 145.9 of the Commission's regulations.

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David Levine  
General Counsel  
Bloomberg L.P.  
731 Lexington Avenue  
New York, NY 10022

The portions of the Application set out on Annex A hereto are referred to herein as the "Confidential Information".

Pursuant to Part 145.9(d)(4) of the Commission's regulations, we have marked each page of the Confidential Information with the words "Confidential Treatment Requested by BSDR LLC" and have numbered each page of the Confidential Information with an identifying number and code.

[signature page follows]

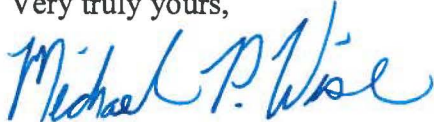
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Please acknowledge receipt of this letter and the enclosed materials by stamping the enclosed copy of this letter and returning it via the pre-paid envelope included with the materials.

Please contact the undersigned at (212) 617-6159 with any questions regarding this matter.

Thank you for your attention to this matter.

Very truly yours,



Michael P. Wise  
Chief Compliance Officer

BSDR LLC  
731 Lexington Avenue  
New York, NY 10022

Enclosure

cc: Mr. Jonathan Lave, Division of Market Oversight, Commodity Futures Trading  
Commission (Email: [jlave@cftc.gov](mailto:jlave@cftc.gov))

Ms. Abigail Knauff, Division of Market Oversight, Commodity Futures Trading  
Commission (Email: [aknauff@cftc.gov](mailto:aknauff@cftc.gov))

Annex A  
Confidential Information

<b>Name of Confidential Information</b>	<b>Identifying Number and Code</b>
Exhibit A	000011
Exhibit A-1	000012
Exhibit A-2	000013
Exhibit B	000014
Exhibit B-2	000019
Exhibit E	000029
Exhibit E-2	000031 – 000032
Exhibit F	000033
Exhibit F-2	000045 – 000061
Exhibit G	000062
Exhibit G-1	000062 – 000068
Exhibit G-2	000069 – 000090
Exhibit G-3	000091 – 000110
Exhibit G-4	000111
Exhibit G-5	000112 – 000113
Exhibit G-6	000114 – 000153
Exhibit G-7	000154 – 000166
Exhibit I	000197
Exhibit I-1	000198
Exhibit K	000222
Exhibit K-1	000223-000398
Exhibit K-2	000399-000423
Exhibit K-3	000424-000494
Exhibit K-4	000495-000500
Exhibit L	000501
Exhibit M	000503-000508
Exhibit N	000509
Exhibit P	000513
Exhibit Q	000514-000556
Exhibit R	000557
Exhibit S	000558-000565
Exhibit T	000566
Exhibit T-1	000567
Exhibit T-2	000568
Exhibit U	000569-000570
Exhibit V	000571-000572
Exhibit W	000573-000575
Exhibit X	000576-000578
Exhibit Y	000579-000580

Exhibit Z	000582-000591
Exhibit AA	000592
Exhibit AA-1	000593-000596
Exhibit BB	000601
Exhibit CC	000602
Exhibit DD	000603
Exhibit EE	000604
Exhibit FF	000606
Exhibit FF-2	000622-000692
Exhibit GG	000693
Exhibit HH	000694
Exhibit II	000695
Exhibit JJ	000696
Exhibit KK	000697
Exhibit LL	000698
Exhibit MM	000699
Operational Capability Technology Questionnaire	000700-000760