BSDR LLC
731 Lexington Avenue
New York, NY 10022

May 7, 2013

FOIA CONFIDENTIAL TREATMENT REQUEST

Submitted via overnight mail and via email

Assistant Secretary of the Commission for FOIA, Privacy and Sunshine Acts Compliance
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581
via email: FOIAsubmissions@cftc.gov

Re: Freedom of Information Act ("FOIA") Confidential Treatment Request for Information Submitted to the Commodity Futures Trading Commission (the "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:

BSDR LLC (the "Applicant"), as proposed operator of a swap data repository, has submitted to the Commission a Swap Data Repository Application for Registration on Form SDR dated March 8, 2013 (the "SDR Application") and an Operational Capability Technology Questionnaire (the "Technology Questionnaire" and together with the SDR Application, the "Application").

As requested by the staff of the Commission, the Applicant has provided the staff of the Commission the following additional information relating to Part 43 and Part 45 of the regulations of the Commission:

(1) the "Part 43 and 45 Questions for SDR Application Review" and the following annexes attached thereto: Compliance Manual, Rulebook, Screen Shot for the Part 43 Real-Time Public Dissemination Functionality, Services Agreement, License Agreement, Apache License, MQ Proof of Entitlement, IBM Passport Advantage Express Agreement, and User Agreement;

(2) the "SDR Checklist – Parts 43 and 45";

(3) the "Mapping by Asset Class" Microsoft Excel spreadsheet in PDF format (the "PDF Mapping Spreadsheet");

(4) the "Credit Sample Message" requested in connection with the PDF Mapping Spreadsheet;

(5) the "Rates Sample Message" requested in connection with the PDF Mapping Spreadsheet;

(6) the "FX Sample Message" requested in connection with the PDF Mapping Spreadsheet;

(7) the "Equity Sample Message" requested in connection with the PDF Mapping Spreadsheet; and

(8) the "Commodity Sample Message" requested in connection with the PDF Mapping Spreadsheet.

For the convenience of the staff of the Commission, the Applicant also provided the staff of the Commission via electronic mail the PDF Mapping Spreadsheet in Microsoft Excel format (the "Excel Mapping Spreadsheet").

The items in sub-clauses (1) through (8) above and the Excel Mapping Spreadsheet are collectively referred to herein as the "Part 43/45 Information".

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.

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

The Part 43/45 Information is 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".

Except with respect to the Excel Mapping Spreadsheet provided to the Commission for convenience[1], we have numbered each page of the Confidential Information with an

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[1] Because of the nature of the Microsoft Excel spreadsheet template that the staff of the Commission provided, we were not able to insert an identifying number and code into each page of the Excel Mapping Spreadsheet. Each page of the PDF Mapping Spreadsheet is numbered with an identifying number and code. The PDF Mapping Spreadsheet contains the same information as the Excel Mapping

identifying number and code beginning with "000995" and ending with "001445". This numbering scheme continues the numbering scheme that the Applicant has used for the materials it has submitted to the Commission to date, each page of which was numbered with an identifying number and code beginning with "000001" and ending with "000994".

[signature page follows]

Spreadsheet. The information in PDF Mapping Spreadsheet and the Excel Mapping Spreadsheet constitutes Confidential Information.

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: Division of Market Oversight, Commodity Futures Trading Commission (Email: submissions@cftc.gov)

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

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

Ms. Laurie Gussow, Division of Market Oversight, Commodity Futures Trading Commission (Email: lgussow@cftc.gov)

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Submitted via email

Division of Market Oversight
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581
via email: submissions@cftc.gov

Re: BSDR LLC – Part 43/45 Information and Related Request for Freedom of Information Act Confidential Treatment

Ladies and Gentlemen:

Pursuant to Section 21 of the Commodity Exchange Act and Part 49 of the regulations of the Commission, BSDR LLC (the "Applicant"), as proposed operator of a swap data repository, submitted to the Commodity Futures Trading Commission (the "Commission") a Swap Data Repository Application for Registration on Form SDR dated March 8, 2013 (the "SDR Application") and an Operational Capability Technology Questionnaire (the "Technology Questionnaire" and, together with the SDR Application, the "Application").

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The items in sub-clauses (1) through (8) above and the Excel Mapping Spreadsheet are collectively referred to herein as the "Part 43/45 Information".

We have submitted to the Assistant Secretary of the Commission for the Freedom of Information Act ("FOIA"), Privacy and Sunshine Acts Compliance a request that for reasons of business confidentiality, the Commission not disclose the Confidential Information (as defined below) or its contents in response to any FOIA request or otherwise for an indefinite period. We wish to inform you that the Confidential Information constitutes, *inter alia*, privileged and confidential trade secrets and commercial or financial information within the meaning of FOIA, 5 U.S.C. § 552(b)(4) and Part 145.9(d)(1)(ii) of the Commission's regulations as well as confidential information covered by 18 U.S.C. § 1905.

For your reference, the Part 43/45 Information is referred to herein as the "Confidential Information".

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.

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

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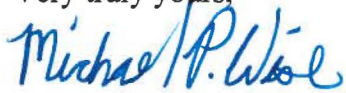
Please contact the undersigned at (212) 617-6159 with any questions regarding this matter.

Very truly yours,



Michael P. Wise
Chief Compliance Officer

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Enclosures

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

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