

Bloomberg SEF LLC  
731 Lexington Avenue  
New York, NY 10022

September 18, 2020

**FOIA CONFIDENTIAL TREATMENT REQUEST**

Submitted via the Portal and via email

CFTC FOIA Compliance Office  
Three Lafayette Centre  
1155 21<sup>st</sup> 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 (“Commission”) by Bloomberg SEF LLC, as operator of a swap execution facility

Ladies and Gentlemen:

Pursuant to Section 5c(c) of the Commodity Exchange Act (the “Act”) and Section 40.6(a) of the regulations of the U.S. Commodity Futures Trading Commission (the “CFTC”, or the “Commission”), Bloomberg SEF LLC (“BSEF”) as the operator of a swap execution facility, submitted to the Commission a rule amendment (the “Amendment”).

Bloomberg SEF hereby requests that the Confidential Information (as defined below) be accorded confidential treatment on the grounds that it would reveal Bloomberg SEF’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 certification described above and attached as Annex A hereto 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 Bloomberg SEF LLC" and have numbered each page of the Confidential Information with an identifying number and code, beginning with "BSEF-0920-0018" and ending with "BSEF-0920-0292."

*[signature page follows]*

Please contact the undersigned at (212) 617-3918 with any questions regarding this matter.

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Devu Shanmugham', with a long horizontal flourish extending to the right.

Devu Shanmugham  
Chief Compliance Officer

Bloomberg SEF LLC  
731 Lexington Avenue  
New York, NY 10022

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

Annex A  
Confidential Information

<b>Name of Confidential Information</b>	<b>Identifying Number and Code</b>
Rule Amendment Self-Certification	BSEF-0920-0018–BSEF-0920-0292