Bloomberg SEF LLC 731 Lexington Avenue New York, NY 10022

November 30, 2016

Submitted via email and the Portal

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

Re: <u>Bloomberg SEF LLC – Rule Amendment and Related Request for Freedom of</u> Information Act Confidential Treatment

Dear Ms. Knauff,

Pursuant to Section 5c(c) of the Commodity Exchange Act (the "<u>Act</u>") and Section 40.6(a) of the regulations of the U.S. Commodity Futures Trading Commission (the "<u>CFTC</u>", or the "<u>Commission</u>"), Bloomberg SEF LLC ("<u>BSEF</u>"), as the operator of a swap execution facility, hereby submits to the Commission a rule amendment (the "Amendment").

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 Amendment set out on <u>Annex A</u> hereto is referred to herein as the "<u>Confidential Information</u>".

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

U.S. Commodity Futures Trading Commission Page 2

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

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-1116-0105" and ending with "BSEF-1116-0469". This numbering scheme continues the numbering scheme that Bloomberg SEF has used for the materials it has submitted to the Commission this month, each page of which was numbered with an identifying number and code beginning with "BSEF-1116-0009" and ending with "BSEF-1116-0104".

[signature page follows]

U.S. Commodity Futures Trading Commission Page 3

Please contact the undersigned at (212) 617-0690 with any questions regarding this matter.

Very truly yours,

Irene Moyseyenko Legal Counsel

Bloomberg L.P. 731 Lexington Avenue New York, NY 10022

Enclosures

Annex A Confidential Information

Name of Confidential Information	Identifying Number and Code
Rule Amendment Self-Certification	BSEF-1116-0105 – BSEF-1116-
	0469