

Bloomberg SEF LLC  
731 Lexington Avenue  
New York, NY 10022

December 7, 2017

**FOIA CONFIDENTIAL TREATMENT REQUEST**

Submitted via FedEx, the Portal and via email

Assistant Secretary of the Commission for FOIA, Privacy and Sunshine Acts Compliance  
U.S. Commodity Futures Trading Commission  
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-1217-0001" and ending with "BSEF-1217-0432."

*[signature page follows]*

Please acknowledge receipt of this letter 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) 617-8302 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 "Gregory Dumark". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Gregory Dumark  
Chief Compliance Officer

Bloomberg SEF LLC  
731 Lexington Avenue  
New York, NY 10022

cc: Abigail Knauff, Division of Market Oversight, U.S. 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>
Rule Amendment Self-Certification	BSEF-1217-0001-BSEF-1217-0432