

Bloomberg SEF LLC  
731 Lexington Avenue  
New York, NY 10022

June 27, 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 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”) Pursuant to Section 5h of the Commodity Exchange Act and Part 37 of the Regulations of the Commission, by Bloomberg SEF LLC, as proposed operator of a swap execution facility

Ladies and Gentlemen:

Bloomberg SEF LLC (the “Applicant”), as proposed operator of a swap execution facility, submitted to the Commission a Swap Execution Facility Application for Registration on Form SEF on June 4, 2013 (together with each exhibit thereto, the “SEF Application”), concurrently with a cover letter requesting temporary registration as a swap execution facility pursuant to Commission regulation 37.3(c). The Applicant submitted one copy of the SEF Application and accompanying cover letter via email to secretary@cftc.gov and to dmosubmissions@cftc.gov on June 4, 2013.

In correspondence dated June 12, 2013, the staff of the Commission provided the Applicant with certain comments and questions with respect to various Exhibits attached to the SEF Application (the “Staff Questions”). The Applicant submitted its responses to the Staff Questions (the “Staff Questions Responses”), as well as certain amended Exhibits to the SEF Application (such amended Exhibits, together with the Staff Questions Responses, the “June 27 Response”).

The Applicant hereby requests that the Confidential Information (as defined below) be accorded confidential treatment on the grounds that it would reveal the Applicant’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 portions of the June 27 Response 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 Bloomberg SEF LLC” and have numbered each page of the Confidential Information with an identifying number and code, beginning with “0602” and ending with “1809”. 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 “0001” and ending with “0601”.

*[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,

  
Gregory Dumark  
Chief Compliance Officer

Bloomberg SEF LLC  
731 Lexington Avenue  
New York, NY 10022

cc: Commodity Futures Trading Commission (Email: [secretary@cftc.gov](mailto:secretary@cftc.gov))

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

Lois Gregory, Division of Market Oversight, Commodity Futures Trading Commission (Email: [LGregory@cftc.gov](mailto:LGregory@cftc.gov))

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

Nancy Markowitz, Division of Market Oversight, Commodity Futures Trading Commission (Email: [NMarkowitz@cftc.gov](mailto:NMarkowitz@cftc.gov))

Amir Zaidi, Division of Market Oversight, Commodity Futures Trading Commission (Email: [AZaidi@cftc.gov](mailto:AZaidi@cftc.gov))

Annex A  
Confidential Information

<b>Name of Confidential Information</b>	<b>Identifying Number and Code</b>
Staff Questions Responses	0602 - 1567
Amended Form SEF (marked)	1572 - 1578
Exhibit B-1 (marked)	1584 - 1588
Exhibit D-2 (clean)	1589 - 1595
Exhibit D-3 (clean and marked)	1596 - 1611
Exhibit G Cover Sheet (marked)	1614 - 1615
Exhibit M (marked)	1689 - 1756
Exhibit N Cover Sheet (clean and marked)	1757 - 1760
Exhibit N-6 (clean)	1761 - 1766
Exhibit N-7 (clean)	1767 - 1800
Exhibit N-8 (clean)	1801 - 1809