

Bloomberg SEF LLC  
731 Lexington Avenue  
New York, NY 10022

July 9, 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, including a question regarding the Applicant’s explanation of the operation of its trading platform, attached as Exhibit Q to the SEF Application (“Exhibit Q”). In response to the staff question, the Applicant submitted a revised Exhibit Q on a stand-alone basis for purposes of the staff’s review.

In addition, the Applicant submitted to the staff of the Commission a request for clarification with respect to Exhibit Q (the “Exhibit Q Questions”).

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

Exhibit Q and the Exhibit Q Questions 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 "1810" and ending with "1814". 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 "1809".

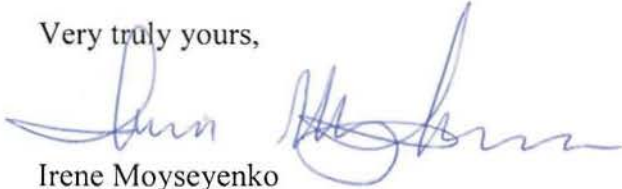
*[signature page follows]*

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) 617-0690 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 'Irene Moyseyenko', is written over the typed name.

Irene Moyseyenko  
Legal Counsel

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

cc: Mr. Jonathan Lave, Division of Market Oversight, 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>
Exhibit Q	1810 – 1813
Exhibit Q Questions	1814