

Bloomberg SEF LLC
731 Lexington Avenue
New York, NY 10022

July 25, 2013

FOIA CONFIDENTIAL TREATMENT REQUEST

Submitted via FedEx and via email

Assistant Secretary of the Commission for FOIA, Privacy and Sunshine Acts Compliance
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st 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 dated June 4, 2013 (together with each exhibit thereto, the “Original Application”), an amended Swap Execution Facility Application for Registration on Form SEF dated June 27, 2013 (together with each exhibit thereto, the “Amended Application”) and a second amended Swap Execution Facility Application for Registration on Form SEF dated July 19, 2013 (together with each exhibit thereto, the “Second Amended Application”).

In correspondence dated July 23, 2013, the staff of the Commission provided the Applicant with certain comments and questions with respect to the Original Application, the Amended Application and the Second Amended Application. In response to such comments and questions, the Applicant submitted responses to staff questions and certain amendments to the Original Application, the Amended Application and the Second Amended Application (such amendments, the “Third Amended Application”).

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 Third Amended Application 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 "1919" and ending with "1982". 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 "1918".

[signature page follows]

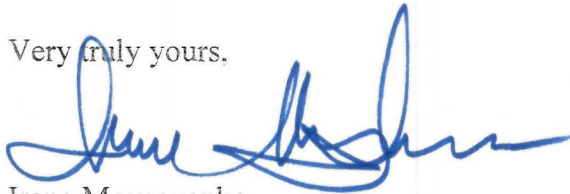
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Please acknowledge receipt of this letter by stamping the enclosed copy of this letter and returning it via the pre-paid enveloped included with the materials.

Please contact the undersigned at (212) 617-0790 with any questions regarding this matter.

Thank you for your attention to this matter.

Very truly yours,



Irene Moyseyenko
Legal Counsel

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

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

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

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

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Amir Zaidi, Division of Market Oversight, Commodity Futures Trading Commission (Email: Azaidi@cftc.gov)

Annex A
Confidential Information

Name of Confidential Information	Identifying Number and Code
Staff Questions Responses	1919 – 1920
Amended Form SEF (marked)	1925 – 1929
Exhibit N Cover Sheet (clean)	1930 – 1931
Exhibit N Cover Sheet (marked)	1932 – 1934
Exhibit N-9 (clean)	1935 – 1961
Exhibit N-10 (clean)	1962 – 1982