

Bloomberg SEF LLC
731 Lexington Avenue
New York, NY 10022

September 27, 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”) by Bloomberg SEF LLC, as operator of a swap execution facility

Ladies and Gentlemen:

Pursuant to Section 5h of the Commodity Exchange Act and Part 37 of the regulations of the Commission, Bloomberg SEF LLC (“BSEF”), as proposed operator of a swap execution facility (“SEF”), 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”), as well as subsequent amendments to the Original Application (such subsequent amendments, together with the Original Application, the “Application”). On July 30, 2013, the Commission granted BSEF’s application for temporary registration to operate a SEF.

BSEF submitted to the Commission certain amendments to the Application to, among other things, reflect updates to agreements and additional agreements entered into by BSEF (the “Amendments”).

BSEF hereby requests that the Confidential Information (as defined below) be accorded confidential treatment on the grounds that it would reveal BSEF’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 Amendments 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 “2167” and ending with “2388”. This numbering scheme continues the numbering scheme that BSEF 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 “2166”.

[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) 617-0790 with any questions regarding this matter.

Thank you for your attention to this matter.

Very truly yours,



Sarah Osborn
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)

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

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

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
Amended Form SEF (marked)	2171 – 2175
Exhibit B-1 (marked)	2181 – 2186
Exhibit B-2 (clean and marked)	2187 – 2190
Exhibit C (marked)	2193 – 2194
Exhibit D-2 (clean)	2197 – 2203
Exhibit D-3 (clean and marked)	2204 – 2219
Exhibit G-1 (marked)	2251 – 2282
Exhibit N Cover Sheet (clean and marked)	2283 – 2288
Exhibit N-2 (clean)	2289 – 2349
Exhibit N-13 (clean)	2350 – 2364
Exhibit N-14 (clean)	2365 – 2376
Exhibit N-15 (clean)	2377 – 2388