

BSDR LLC  
731 Lexington Avenue  
New York, NY 10022

August 26, 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 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 (the “Commission”) Pursuant to Section 21 of the Commodity Exchange Act and Part 49 of the Regulations of the Commission, by BSDR LLC, as proposed operator of a swap data repository

Ladies and Gentlemen:

Pursuant to Section 21 of the Commodity Exchange Act and Part 49 of the regulations of the Commission, BSDR LLC (the “Applicant”), as proposed operator of a swap data repository, submitted to the Commission a third amended Swap Data Repository Application for Registration on Form SDR dated August 2, 2013 (together with each exhibit thereto, the “Third Amended Application”).

On July 23, 2013, the staff of the Commission provided the Applicant with certain comments and questions with respect to the ability of the Applicant’s employees and employees of the Applicant’s affiliate to access confidential information maintained by the Applicant in its capacity as a swap data repository (the “Staff Questions”). The Applicant is hereby submitting its responses to the Staff Questions (the “Staff Questions Responses”).

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.

600030879

David Levine  
General Counsel  
Bloomberg L.P.  
731 Lexington Avenue  
New York, NY 10022

The Staff Questions Responses identified on Annex A hereto are collectively 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 BSDR LLC” and have numbered each page of the Staff Questions Responses with an identifying number and code beginning with “003629” and ending with “003633”. 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 “000001” and ending with “003628”.

*[signature page follows]*

Commodity Futures Trading Commission

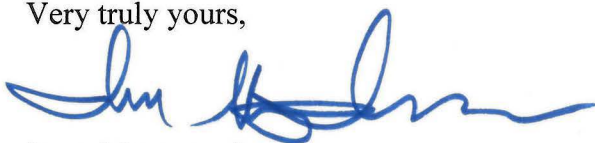
Page 3

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,



Irene Moyseyenko  
Legal Counsel

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

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

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

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

Abigail S. Knauff, Division of Market Oversight, Commodity Futures Trading Commission (Email: aknauff@cftc.gov)

Annex A  
Confidential Information

<b>Name of Confidential Information</b>	<b>Identifying Number and Code</b>
Staff Questions Responses	003629 - 003633