

BSDR LLC
731 Lexington Avenue
New York, NY 10022

January 14, 2014

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 (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 Swap Data Repository Application for Registration on Form SDR dated March 8, 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 January 9, the staff of the Commission provided the Applicant with certain questions with respect to the Application (the “Staff Questions”). On January 10, the Applicant submitted its responses to the Staff Questions (the “Staff Questions Responses”), wherein the Applicant referenced certain revisions to be made to the Application. The Applicant submitted such revisions, as well as certain revisions to its technology questionnaire (the “Technology Questionnaire”).

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

For your reference, the portions of the Application and the Technology Questionnaire 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 BSR LLC" and have numbered each page of the Application and the Technology Questionnaire with an identifying number and code beginning with "007973" and ending with "008871". 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 "007972".

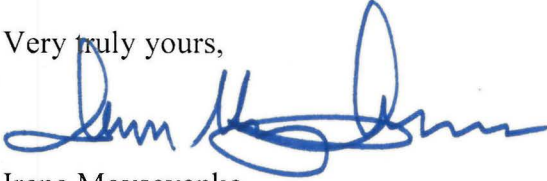
[signature page follows]

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,



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

Name of Confidential Information	Identifying Number and Code
Form SDR (marked)	007976 – 007979
Exhibit G-1 (clean)	007980 – 007986
Exhibit J (marked)	008018 – 008048
Exhibit K-1 (clean and marked)	008049 – 008524
Exhibit O (marked)	008527 – 008529
Exhibit Q Cover Sheet (clean and marked)	008530 – 008533
Exhibit Q-2 (clean)	008534 – 008535
Exhibit T-2 (clean)	008536 – 008537
Exhibit AA-2 (marked)	008545 – 008552
Exhibit FF-2 (clean and marked)	008553 – 008750
Technology Questionnaire (clean and marked)	008751 – 008871