

March 8, 2013

**FOIA CONFIDENTIAL TREATMENT REQUEST**

Submitted via overnight mail

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

Re: Freedom of Information Act (“FOIA”) Confidential Treatment Request for Information Submitted to the Commodity Futures Trading Commission (“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:

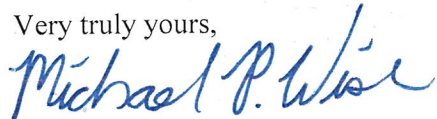
By letter of even date herewith BSDR LLC, as proposed operator of a swap data repository, submitted to the Commission a Swap Data Repository Application for Registration on Form SDR (the “SDR Application”) and an Operational Capability Technology Questionnaire (the “Technology Questionnaire” and together with the SDR Application and BSDR LLC’s letter to the Commission, the “Application”). BSDR LLC requested that certain portions of the Application be accorded confidential treatment on the grounds that they would reveal BSDR LLC’s trade secrets and confidential commercial or financial information. We request this confidential treatment for an indefinite period. In compliance with Part 145.9 of the Commission’s regulations, we hereby submit to you a copy of the FOIA Confidential Treatment Request letter sent to the Commission.

Please acknowledge receipt of this letter and the enclosed materials 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) 617-6159 with any questions regarding this filing.

Thank you for your attention to this matter.

Very truly yours,



Michael P. Wise  
Chief Compliance Officer

BSDR LLC  
731 Lexington Avenue  
New York, NY 10022

Enclosure

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

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

BSDR LLC  
731 Lexington Avenue  
New York, NY 10022

March 8, 2013

**FREEDOM OF INFORMATION ACT**  
**CONFIDENTIAL TREATMENT REQUEST**

Submitted via email and via overnight mail

Division of Market Oversight – Exchange and Repository Branch  
U.S. Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, N.W.  
Washington, D.C. 20581  
submissions@cftc.gov  
dmosubmissions@cftc.gov

Re: BSDR LLC – Swap Data Repository Application for Registration on Form SDR Pursuant to Section 21 of the Commodity Exchange Act and Part 49 of the Regulations of the Commodity Futures Trading Commission (“Commission”), and Request for Freedom of Information Act Confidential Treatment

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, hereby submits a Swap Data Repository Application for Registration on Form SDR (the “SDR Application”), including Applicant’s “Provisional Checklist” attached thereto as Exhibit FF-2, and an Operational Capability Technology Questionnaire (the “Technology Questionnaire” and together with the SDR Application and this letter, the “Application”). The Applicant is submitting one copy of the Application via email to submissions@cftc.gov and to dmosubmissions@cftc.gov and, for convenience, six paper copies of the Application via overnight mail to the attention of Ms. Abigail Knauff.

Those portions of the Application set out on Annex A hereto are referred to herein as the “Confidential Information”.

We have submitted to the Assistant Secretary of the Commission for the Freedom of Information Act (“FOIA”), Privacy and Sunshine Acts Compliance a request that for reasons of business confidentiality, the Commission not disclose the Confidential Information or its contents in response to any FOIA request or otherwise for an indefinite period. We wish to inform you that the Confidential Information constitutes, *inter alia*, privileged and confidential trade secrets and commercial or financial information within

Commodity Futures Trading Commission  
March 8, 2013  
Page 2

the meaning of FOIA, 5 U.S.C. § 552(b)(4) and Part 145.9(d)(1)(ii) of the Commission's regulations as well as confidential information covered by 18 U.S.C. § 1905.

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

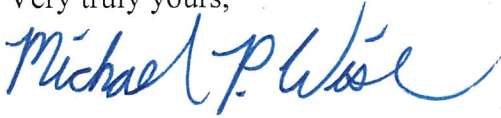
Pursuant to Part 145.9(d)(4) of the Commission's regulations, we have marked each page of the Confidential Information with the words "Confidential Treatment Requested by BSDR LLC" and have numbered each page of the Application with an identifying number and code, beginning with "00001" and ending with "0000760".

[signature page follows]

Commodity Futures Trading Commission  
March 8, 2013  
Page 3

Please contact the undersigned at (212) 617-6159 with any questions regarding this filing.

Very truly yours,



Michael P. Wise  
Chief Compliance Officer

BSDR LLC  
731 Lexington Avenue  
New York, NY 10022

Enclosures

cc: Mr. Jonathan Lave, Division of Market Oversight, Commodity Futures Trading Commission  
(Email: [jlave@cftc.gov](mailto:jlave@cftc.gov)) (with enclosures)

Ms. Abigail Knauff, Division of Market Oversight, Commodity Futures Trading Commission  
(Email: [aknauff@cftc.gov](mailto:aknauff@cftc.gov)) (with enclosures)

Assistant Secretary of the Commission for FOIA, Privacy and Sunshine Acts  
Compliance, Commodity Futures Trading Commission (without enclosures)



Annex A  
 Confidential Information

<b>Name of Confidential Information</b>	<b>Identifying Number and Code</b>
Submission Letter	Not applicable
Exhibit A	000011
Exhibit A-1	000012
Exhibit A-2	000013
Exhibit B	000014
Exhibit B-2	000019
Exhibit E	000029
Exhibit E-2	000031 – 000032
Exhibit F	000033
Exhibit F-2	000045 – 000061
Exhibit G	000062
Exhibit G-1	000063 – 000068
Exhibit G-2	000069 – 000090
Exhibit G-3	000091 – 0000110
Exhibit G-4	0000111
Exhibit G-5	0000112 – 0000113
Exhibit G-6	0000114 – 0000153
Exhibit G-7	0000154 – 0000165
Exhibit I	0000197
Exhibit I-1	0000198
Exhibit K	0000222
Exhibit K-1	0000223-0000398
Exhibit K-2	0000399-0000423
Exhibit K-3	0000424-0000494
Exhibit K-4	0000495-0000500
Exhibit L	0000501
Exhibit M	0000503-0000508
Exhibit N	0000509
Exhibit P	0000513
Exhibit Q	0000514-0000556
Exhibit R	0000557
Exhibit S	0000558-0000565
Exhibit T	0000566
Exhibit T-1	0000567
Exhibit T-2	0000568
Exhibit U	0000569-0000570
Exhibit V	0000571-0000572

Exhibit W	0000573-0000575
Exhibit X	0000576-0000578
Exhibit Y	0000579-0000580
Exhibit Z	0000582-0000591
Exhibit AA	0000592
Exhibit AA-1	0000593-0000596
Exhibit BB	0000601
Exhibit CC	0000602
Exhibit DD	0000603
Exhibit EE	0000604
Exhibit FF	0000606
Exhibit FF-2	0000622-0000692
Exhibit GG	0000693
Exhibit HH	0000694
Exhibit II	0000695
Exhibit JJ	0000696
Exhibit KK	0000697
Exhibit LL	0000698
Exhibit MM	0000699
Operational Capability Technology Questionnaire	0000700-0000760