

BSDR LLC
731 Lexington Avenue
New York, NY 10022

March 22, 2013

FOIA CONFIDENTIAL TREATMENT REQUEST

Submitted via overnight mail 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 BSR LLC, as proposed operator of a swap data repository

Ladies and Gentlemen:

BSDR LLC, as proposed operator of a swap data repository, has submitted to the Commission a Swap Data Repository Application for Registration on Form SDR dated March 8, 2013 (the "SDR Application") and an Operational Capability Technology Questionnaire (the "Technology Questionnaire" and together with the SDR Application, the "Application").

In order to facilitate review of the Application by the Commission's staff, a staff member of the Commission, Ms. Abigail Knauff, requested that we fill out an updated checklist related to Part 49 of the regulations of the Commission (the "Part 49 Checklist").

BSDR LLC hereby requests that the Confidential Information (as defined below) be accorded confidential treatment on the grounds that it would reveal BSR LLC'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 Part 49 Checklist is 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 Confidential Information with an identifying number and code beginning with “000761” and ending with “000859”. This numbering scheme corresponds to that of the Application, each page of which was numbered with an identifying number and code beginning with “000001” and ending with “000760”.

[signature page follows]

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 matter.

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)

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

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

BSDR LLC
731 Lexington Avenue
New York, NY 10022

March 22, 2013

Submitted via email

Division of Market Oversight
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581
via email: submissions@cftc.gov

Re: BSDR LLC – Part 49 Checklist and Related 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, submitted to the Commodity Futures Trading Commission (the "Commission") a Swap Data Repository Application for Registration on Form SDR dated March 8, 2013 (the "SDR Application") and an Operational Capability Technology Questionnaire (the "Technology Questionnaire" and, together with the SDR Application, the "Application").

In order to facilitate review of the Application by the Commission's staff, a staff member of the Commission, Ms. Abigail Knauff, requested that we fill out an updated checklist related to Part 49 of the regulations of the Commission (the "Part 49 Checklist").

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 (as defined below) 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 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.

For your reference, the Part 49 Checklist is referred to herein as the "Confidential Information".

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 Confidential Information with an identifying number and code beginning with "000761" and ending with "000859". This numbering scheme corresponds to that of the Application, each page of which was numbered with an identifying number and code beginning with "000001" and ending with "000760".

[signature page follows]

Commodity Futures Trading Commission

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

Very truly yours,



Michael P. Wise
Chief Compliance Officer

BSDR LLC
731 Lexington Avenue
New York, NY 10022

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

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