

BSDR LLC  
731 Lexington Avenue  
New York, NY 10022

June 20, 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 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:

BSDR LLC (the “Applicant”), as proposed operator of a swap data repository, submitted to the Commission an amended Swap Data Repository Application for Registration on Form SDR dated May 7, 2013 (“Amended Form SDR”), certain amended exhibits thereto (the “Amended Exhibits”) and an amended Operational Capability Technology Questionnaire (such Operational Capability Technology Questionnaire, together with Amended Form SDR and the Amended Exhibits, the “Amended Application”).

In correspondence dated May 30, 2013, the staff of the Commission provided the Applicant with certain comments and questions with respect to the Amended Application (the “Staff Questions”). The Applicant submitted its responses to the Staff Questions (the “Staff Questions Responses”), a second amended Swap Data Repository Application for Registration on Form SDR dated June 20, 2013 (“Second Amended Form SDR”) and certain amended Exhibits thereto (such amended Exhibits, together with the Second Amended Form SDR, the “Second Amended Application”). As requested by the staff of the Commission, the Second Amended Application consists in part of blackline comparisons showing portions of the Second Amended Application marked against corresponding portions of the Amended Application.

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.

600021645

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 Staff Questions Responses and the portions of the Second Amended Application 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 Confidential Information with an identifying number and code beginning with "002547" and ending with "003146". 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 "002546".

*[signature page follows]*

Commodity Futures Trading Commission

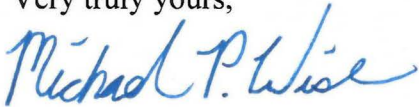
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Please acknowledge receipt of this letter by stamping the enclosed copy of this letter and returning it via the pre-paid envelope included with the materials.

Please contact the undersigned at (212) 617-6159 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

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

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

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

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

Annex A  
Confidential Information

<b>Name of Confidential Information</b>	<b>Identifying Number and Code</b>
Staff Questions Responses	002547 - 002554
Amended Form SDR (marked)	002558 - 002562
Exhibit B-1 (marked)	002569 - 002574
Exhibit D-2 (marked)	002581 - 002586
Exhibit G-1 (clean)	002589 - 002595
Exhibit H-1 (marked)	002625 - 002653
Exhibit J (marked)	002680 - 002706
Exhibit K-1 (clean and marked)	002707 - 003108
Exhibit AA Cover Sheet (clean and marked)	003109 - 003112
Exhibit AA-1 (clean and marked)	003113 - 003122
Exhibit AA-2 (marked)	003129 - 003135
Exhibit AA-3 (clean)	003136 - 003140
Exhibit AA-4 (clean)	003141 - 003146