

BSDR LLC
731 Lexington Avenue
New York, NY 10022

July 17, 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 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:

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 “Form SDR”) and an Operational Capability Technology Questionnaire (such Operational Capability Technology Questionnaire, together with the Form SDR, the “Application”).

As part of the review of the Application by the Commission’s staff, staff visited the office of the Applicant and its service provider, Bloomberg L.P., on July 12, 2013. During your visit, certain employees of the Applicant demonstrated certain functionalities of the swap data repository that the Applicant proposes to operate (the “Demonstration”). At the request of Commission staff, we provided electronic copies of the materials presented during the Demonstration (such copies, the “Materials”).

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.

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

The Materials identified on Annex A hereto are 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 “003147” and ending with “003175”. 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 “003146”.

[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: 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)

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

Annex A
Confidential Information

Name of Confidential Information	Identifying Number and Code
Overview	003147 – 003154
Systems Presentation	003155 – 003161
Website View	003162 – 003167
Regulator View	003168 – 003173
CumulativeSliceSample	003174
DailySliceSample	003175