

BSDR LLC
731 Lexington Avenue
New York, NY 10022

September 10, 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:

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 fourth amended Swap Data Repository Application for Registration on Form SDR dated September 2, 2013 (together with each exhibit thereto, the “Fourth Amended Application”).

On September 5, 2013, the staff of the Commission provided the Applicant with certain questions with respect to Part 49 of the Commission’s Rules (the “Staff Questions”). The Applicant is hereby submitting its responses to the Staff Questions (the “Staff Questions Responses”), a fifth amended Swap Data Repository Application for Registration on Form SDR dated September 10, 2013 (“Fifth Amended Form SDR”) and certain amended exhibits thereto (such amended exhibits, together with the Fifth Amended Form SDR, the “Fifth Amended Application”). As requested by the staff of the Commission, the Staff Questions Responses and the Fifth Amended Application consist in part of blackline comparisons showing portions of the Fifth Amended Application marked against corresponding portions of the Fourth 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.

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 portions of the Staff Questions Responses and the Fifth 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 BSR LLC" and have numbered each page of the Staff Questions Responses with an identifying number and code beginning with "004424" and ending with "005052". 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 "004423".

[signature page follows]

Commodity Futures Trading Commission

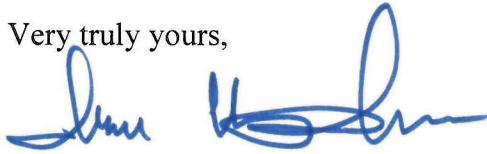
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Please acknowledge receipt of this letter by stamping the enclosed copy of this letter and returning it via the pre-paid envelope included with the materials.

Please contact the undersigned at (212) 617-0690 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
Staff Questions Responses (clean)	004424 – 004427
Bloomberg Core Guide and Access Policy (clean)	004428 – 004479
Amended Form SDR (marked)	004483 – 004486
Exhibit B-1 (marked)	004493 – 004498
Exhibit D-2 (marked)	004505 – 004510
Exhibit E-1 (marked)	004515 – 004518
Exhibit J (marked)	004547 – 004575
Exhibit K-1 (clean and marked)	004576 – 005029
Exhibit U (clean and marked)	005030 - 005039
Exhibit Z (clean and marked)	005040 – 005043
Exhibit AA-3 (clean)	005044 – 005047
Exhibit MM (clean and marked)	005048 – 005052