

BSDR LLC  
731 Lexington Avenue  
New York, NY 10022

September 12, 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 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:

Pursuant to Section 21 of the Commodity Exchange Act and Part 49 of the regulations of the Commodity Futures Trading Commission (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 10, 2013 (together with each exhibit thereto, the “Fifth Amended Application”).

On September 11, 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”), as well as revised Exhibits G-2, G-3, J, AA-2 and FF-2 (clean and marked) on a stand-alone basis for purposes of the staff’s review.

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 exhibits 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 Staff Questions Responses with an identifying number and code beginning with “005053” and ending with “005359”. 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 “005052”.

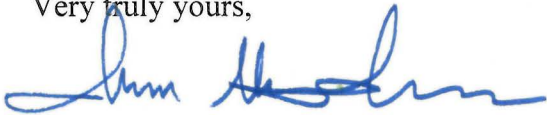
*[signature page follows]*

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

<b>Name of Confidential Information</b>	<b>Identifying Number and Code</b>
Staff Questions Responses (clean)	005053 – 005054
Annex A (clean)	005055 – 005058
Annex B (clean)	005059 – 005060
Exhibit G-2 (clean and marked)	005061 - 005104
Exhibit G-3 (clean and marked)	005105 – 005145
Exhibit J (clean and marked)	005146 – 005202
Exhibit AA-2 (clean and marked)	005203 – 005215
Exhibit FF-2 (clean and marked)	005216 – 005359