

September 10, 2015

Submitted via Portal

U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: Bloomberg SEF LLC – Certification 2015-R-9 (Notice to Participants)

Ladies and Gentlemen:

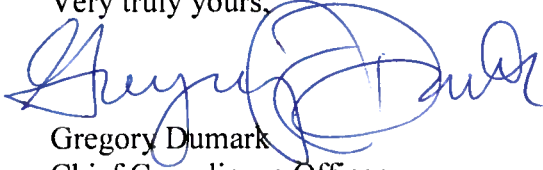
Pursuant to Section 5c(c) of the Commodity Exchange Act (the “Act”) and Section 40.6(a) of the regulations of the Commodity Futures Trading Commission (the “Commission”), Bloomberg SEF LLC (“Bloomberg SEF”) hereby notifies the Commission that Bloomberg SEF will release the Notice to Participants attached hereto as Exhibit A on September 11, 2015 (the “Notice”).

The Notice provides guidance to Participants regarding Bloomberg SEF’s policy governing error trades, cancelation of error trades and offsetting of error trades. We have identified that the Notice may have some bearing on the following Commission regulations: 37.9; 37.203(a); and No-Action Letter 15-24 (April 22, 2015).

Bloomberg SEF hereby certifies that: (i) the Notice to Participants complies with the Act and the Commission’s regulations thereunder, and (ii) a notice and copy of this submission is being concurrently posted on Bloomberg SEF’s web site. There were no substantive opposing views to the Notice to Participants.

Please contact the undersigned at (212) 617-8302 with any questions regarding this matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Gregory Dumark", with a large circular flourish at the end.

Gregory Dumark
Chief Compliance Officer

Bloomberg SEF LLC
731 Lexington Avenue
New York, NY 10022

Enclosures

Bloomberg SEF LLC: Notice to Participants

2015-1

ERROR TRADE CORRECTION

Error Trades executed on BSEF can be corrected upon the consent of BSEF and in accordance with Rule 516 Trade Cancellation, Correction, Offset and Adjustment. A Participant must notify the BSEF Support Desk of an Alleged Error Trade.

If BSEF concludes that the Alleged Error Trade was a result of a clerical or operational error and that the correction of the Alleged Error Trade is appropriate and would not adversely impact market integrity, facilitate market manipulation or other illegitimate activity, or otherwise violate the CEA, CFTC Regulations or BSEF Rules, BSEF will designate the Alleged Error Trade as an “Error Trade.” Once an Alleged Error Trade is designated as an Error Trade, the affected Participants may have the opportunity to correct the Error Trade.

If an affected Participant is able take advantage of the correction process described in Rule 516.B (a)(i)(B) and offset the Error Trade by entering into a pre-arranged Trade with terms that offset the position on the books of the Clearing House that resulted from the Error Trade, the Participant should raise an RFQ ticket, refer to the field denoted “*RFQ Minimum Exception*” and choose “*Error Offset*” from the drop down menu options before submitting the Order.

If an affected Participant wishes to enter the correct trade, the affected Participant should raise an RFQ ticket, refer to the field denoted “*RFQ Minimum Exception*” and choose “*Error Correction*” before submitting the Order.

Please note that capitalized terms mentioned herein refer to defined terms in the BSEF Rulebook.

Effective Date: September 25, 2015

Attachment: BSEF Rule 516

RULE 516. Trade Cancellation, Correction, Offset and Adjustment

RULE 516.A Trade Review and Notification of Action Taken

(a) Any Trade executed on or in accordance with the Rules of the SEF operated by BSEF can be canceled, corrected, adjusted or offset only upon consent of BSEF and in accordance with this Rule 516. To request cancellation, correction, adjustment or offset of a Trade alleged to be erroneous (“**Alleged Error Trade**”), a Participant must notify the BSEF Support Desk at 1-212-617-1530 by providing the Trade ID (FIT Key) of the Alleged Error Trade and stating the grounds for the request as soon as possible, but no later than the end of the Business Day following the date of execution of the Alleged Error Trade.

(b) For an Alleged Error Trade, the Compliance Department will review promptly the electronic audit trail of the Alleged Error Trade as well as any other facts and circumstances associated with the Alleged Error Trade. If BSEF makes an affirmative finding that the Alleged Error Trade was the result of a clerical or operational error and that the cancellation, correction, adjustment or offset of the Alleged Error Trade is appropriate and would not adversely impact market integrity, facilitate market manipulation or other illegitimate activity, or otherwise violate the CEA, CFTC Regulations or BSEF Rules, BSEF will designate such Alleged Error Trade as an “**Error Trade.**”

(c) BSEF will inform affected Participants of the Error Trade and of the next steps that the Participants must or could make. BSEF will also inform the affected Participants of the final disposition of the Error Trade.

(d) In the course of its review of an Alleged Error Trade, other than a Trade executed via the CLOB, BSEF may, but is not obliged to, inform Participants affected by the Alleged Error Trade of the identity and contact information of any other Participant affected by the Alleged Error Trade.

(e) For Trades executed via the CLOB that are determined to be Error Trades, BSEF will inform Participants affected by the Error Trade of the identity and contact information of any other Participant affected by the Error Trade if (i) all such Participants agree to or are required to enter into Trades described in Rule 516.B; and (ii) all such Participants consent to the disclosure of their identity and contact information to any other Participant affected by the Error Trade.

(f) For purposes of this Rule 516, a Participant involved in an Alleged Error Trade and acting as an Account Manager, Introducing Broker or FCM shall have the authority to request or consent to the cancellation, adjustment or offset, as applicable, of such Trade on behalf of the relevant Counterparty involved in the Trade.

RULE 516.B Error Trade Cancellation, Correction and Offset – Cleared Swaps

(a) Participant Errors

- (i) For each Error Trade, BSEF may, if both Participants agree,
 - (A) request the appropriate Clearing House to cancel the Error Trade; or
 - (B) (1) allow the affected Participants to enter into a pre-arranged Trade with terms that offset the position on the books of the Clearing House that resulted

from the Error Trade; and (2) if desired by the affected Participants, allow the affected Participants to execute a new Trade that corrects the error in the Error Trade.

(ii) All BSEF Rules other than Rule 506 and Rule 522.A shall apply to new Trades executed by Participants pursuant to this Rule 516.B(a).

(b) **System Errors**

(i) If, after its own investigation or a notice from a Participant, BSEF determines in its sole discretion that the execution of a Trade was the result of an error made by the SEF Platform and the Trade has been designated as an Error Trade, then BSEF may:

(A) request the appropriate Clearing House to cancel the Error Trade; or

(B) (1) direct the affected Participants to enter into a pre-arranged Trade with terms that offset the position on the books of the Clearing House that resulted from the Error Trade; and (2) if desired by the affected Participants, allow the affected Participants to execute a new Trade that corrects the error in the Error Trade.

(ii) If BSEF directs affected Participants to enter into a pre-arranged Trade in accordance with sub-section (i)(B) above, the affected Participants shall enter into such pre-arranged Trade.

(iii) All BSEF Rules other than Rule 506 and Rule 522.A shall apply to new Trades executed by Participants pursuant to this Rule 516.B(b).

(iv) Notwithstanding anything to the contrary in this Rule 516(B)(b), BSEF reserves the right to correct an Error Trade resulting from an error made by the SEF Platform by any means BSEF deems appropriate.

(v) If BSEF is unable to determine how to correct the Error Trade, BSEF may either not fix the error, or it may seek guidance on how to address the error from the affected Participants. Any such guidance may not be implemented without consent from both Participants.

(c) **Timing of an Offset and Correction.** For Error Trades in Cleared Swaps, the Trade to offset the Error Trade carried on the Clearing House's books or the new Trade that corrects the error in the Error Trade executed pursuant to this Rule 516.B must be executed and submitted for clearing no later than three Business Days after the Error Trade was executed.

RULE 516.C Error Trade Cancellation and Adjustment – Non-Cleared Swaps

(a) **Participant Error**

(i) The Participants involved in an Error Trade may mutually agree to cancel the Error Trade or to adjust the price of the Trade. BSEF will cancel or adjust the Error Trade as instructed by the affected Participants.

(b) **System Error**

(i) If, after its own investigation or a notice from a Participant, BSEF determines in its sole discretion that the execution of a Trade was the result of an error made by

the SEF Platform and the Trade has been designated as an Error Trade, then BSEF may:

(A) cancel such Trade; or

(B) of both Participants affected by the Error Trade agree, adjust the price.

(c) **Timing of a Cancellation or Adjustment.** Any cancellation or adjustment made pursuant to this Rule 516.C shall be made no later than three Business Days after the Error Trade was discovered.

RULE 516.D Prime Broker Trades

(a) A Participant that is a Counterparty to a Prime Broker Trade may request the cancellation of a Prime Broker Trade by sending a cancellation message to BSEF. The cancellation message must state the name and contact information of the Prime Broker for the Prime Broker Trade and the reason for cancellation. If the Prime Broker confirms the cancellation, BSEF will cancel the Prime Broker Trade.

(b) Subject to subsection (c) of this Rule, a Prime Broker shall have the right to cancel any Prime Broker Trade (i) that is executed in excess of the limit established by the Prime Broker with respect to the Prime Broker Trade, (ii) because the Prime Broker Trade was executed by a Person that was not authorized by the Prime Broker, or (iii) because the Prime Broker Trade was executed for an unauthorized product. The Prime Broker shall communicate the cancellation directly to BSEF within 48 hours after the execution of the Prime Broker Trade and indicate the reason for the cancellation.

(c) Each Prime Broker that wishes to have the ability to instruct BSEF to cancel Trades executed on BSEF under Rule 516.B.(b) must sign documentation required by BSEF.

RULE 516.E Trade Cancellation and Adjustment by BSEF

(a) BSEF may adjust or cancel a Trade that resulted from a market disrupting event or that is executed at a price that was outside the No-Bust Range.

(b) If BSEF takes action pursuant to this Rule 516.E, it will give prompt notice to affected Participant or Participants and will use good faith, commercially reasonable efforts to obtain such Participants' consent to such adjustment or cancellation.

RULE 516.F Trade Reporting by BSEF

BSEF will report the adjustment or cancellation of the Error Trade and any new Trade entered into pursuant to this Rule in accordance with Rule 532.