

Bloomberg SEF LLC
731 Lexington Avenue
New York, NY 10022

September 17, 2020

Submitted via email and the Portal

Jonathan Lave
Division of Market Oversight
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581
via email: JLave@cftc.gov

Re: Bloomberg SEF LLC – Rule Amendment and Related Request for Freedom of Information Act Confidential Treatment

Dear Mr. Lave,

Pursuant to Section 5c(c) of the Commodity Exchange Act (the “Act”) and Section 40.6(a) of the regulations of the U.S. Commodity Futures Trading Commission (the “CFTC”, or the “Commission”), Bloomberg SEF LLC (“BSEF”), as the operator of a swap execution facility, hereby submits to the Commission a rule amendment (the “Amendment”).

We have submitted to the CFTC Freedom of Information Act (“FOIA”) Compliance Office a request that for reasons of business confidentiality, the Commission not disclose the Confidential Information (as defined below) or its contents in response to any FOIA request or otherwise for an indefinite period. We wish to inform you that the Confidential Information constitutes, *inter alia*, privileged and confidential trade secrets and commercial or financial information within the meaning of FOIA, 5 U.S.C. § 552(b)(4) and Part 145.9(d)(1)(ii) of the Commission’s regulations as well as confidential information covered by 18 U.S.C. § 1905.

For your reference, the Amendment set out on Annex A hereto is referred to herein as the “Confidential Information.”

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

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 Bloomberg SEF LLC" and have numbered each page of the Confidential Information with an identifying number and code, beginning with "BSEF-0920-0001" and ending with "BSEF-0920-0017."

[signature page follows]

Please contact the undersigned at (212) 617-3918 with any questions regarding this matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Devi Shanmugham', with a long horizontal flourish extending to the right.

Devi Shanmugham
Chief Compliance Officer

Bloomberg SEF LLC
731 Lexington Avenue
New York, NY 10022

cc: Jonathan Lave, Division of Market Oversight, U.S. Commodity Futures
Trading Commission (Email: JLave@cftc.gov)

Annex A
Confidential Information

Name of Confidential Information	Identifying Number and Code
Rule Amendment	BSEF-0920-0001– BSEF-0920-0017