

Bloomberg SEF LLC
731 Lexington Avenue
New York, NY 10022

September 22, 2020

FOIA CONFIDENTIAL TREATMENT REQUEST

Submitted via email¹

CFTC FOIA Compliance Office
U.S. 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 (“Commission”) by Bloomberg SEF LLC, as operator of a swap execution facility

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 U.S. Commodity Futures Trading Commission (the “CFTC”, or the “Commission”), Bloomberg SEF LLC (“BSEF”) as the operator of a swap execution facility, submitted to the Commission a rule amendment (the “Amendment”).

Bloomberg SEF hereby requests that the Confidential Information (as defined below) be accorded confidential treatment on the grounds that it would reveal Bloomberg SEF’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

¹ Request being submitted via email only given the circumstances surrounding the COVID-19 pandemic, including a security order declared by Governor Cuomo.

The certification described above and attached as Annex A hereto is 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 Bloomberg SEF LLC” and have numbered each page of the Confidential Information with an identifying number and code, beginning with “BSEF-0920-0293” and ending with “BSEF-0920-0307.”

[signature page follows]

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

Thank you for your attention to 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

Annex A
Confidential Information

Name of Confidential Information	Identifying Number and Code
Rule Amendment Self-Certification	BSEF-0920-0293-BSEF-0920-0307