

May 23, 2024

Submitted via Portal

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

Re: CFTC Regulation 40.6(a) Certification: Amendment to the Bloomberg SEF LLC Rulebook  
BSEF Submission No. 2024-R-07

Ladies and Gentlemen:

Bloomberg SEF LLC ("**BSEF**") is certifying to the U.S. Commodity Futures Trading Commission ("**CFTC**" or "**Commission**") the amendment of Rule 1327 ("**Rule Amendment**"). The Rule Amendment is effective on **June 10, 2024**. A concise explanation of the Rule Amendment is in the below table.

| Chapter   | Rule   | Amendment Explanation  |
|---|--|--|
| Chapter 13. Rates Contracts<br>Terms and Conditions | RULE 1327.<br>CAD CDOR Fixed-to-<br>Floating | Amended to remove LCH Clearnet Ltd ("LCH") as a Clearing House for the CAD CDOR Fixed-to-Floating contract because CAD CDOR will no longer be eligible for clearing through LCH after June 8, 2024, which is the date LCH will amend contracts to reference CORRA instead of CAD CDOR. |

**Exhibit A** provides amendments to the applicable BSEF Rulebook Chapter in redline format.

BSEF reviewed the swap execution facility core principles ("**Core Principles**") as set forth in the Commodity Exchange Act ("**Act**" or "**CEA**") and identified that the Rule Amendment in **Rule 1327** may have some bearing on the following Core Principles:

- **Swaps Not Readily Susceptible to Manipulation (Core Principle 3):** BSEF believes that Rule Amendment does not change the prior determination that swaps listed in Chapter 13 (Rule 1327) are not readily susceptible to manipulation.
- **Financial integrity of transactions (Core Principle 7):** BSEF will make publicly available the details of the amendment by publishing this submission on BSEF's website.
- **Emergency Authority (Core Principle 8):** The amendment is in line with regulatory guidance, and as all market participants are aware that LCH eligibility for CDOR will end on June 8, 2024, there will be no undue market disruption related to the amendment of this contract.

Pursuant to Section 5c(c) of the Act and CFTC Regulations 40.6(a), BSEF hereby certifies that the Rule Amendment complies with the Act, including all regulations thereunder. There were no substantive opposing views to the proposal.

Bloomberg SEF certifies that this submission has been concurrently posted on the BSEF website at <https://www.bloomberg.com/professional/product/sef-compliance>.

Please contact the undersigned at (212) 617-7331 with any questions regarding this matter.

Very truly yours

A handwritten signature in black ink, appearing to read "Daniel Glatter", written over a horizontal line.

Daniel Glatter  
Chief Compliance Officer

Bloomberg SEF LLC  
73 I Lexington Avenue  
New York, NY 10022

**Enclosure**

# Exhibit A

# BLOOMBERG SEF LLC RULEBOOK

~~MAY 31~~JUNE 10, 2024

**RULE 1327.**

**CAD CDOR Fixed-to-Floating**

|  |  |
|--|--|
| <b>Contract Overview</b>                       | Interest Rate Swap. An agreement to exchange a stream of cash flows by applying a fixed and floating interest rate to a specified notional over a term to maturity.  |
| <b>Ticker</b>                                  | CAD SWAP 3M [Reference Rate Term Value] [Swap Tenor or Maturity Date]  |
| <b>Reference Rate Index</b>                    | CAD-CDOR<br>CAD-BA-CDO<br>R  |
| <b>Reference Rate Term Value</b>               | 3 Months   |
| <b>Fixed Rate</b>                              | Par; Custom Coupon   |
| <b>Notional Currency</b>                       | CAD  |
| <b>Notional Schedule</b>                       | Constant   |
| <b>Quoting Convention</b>                      | Fixed rate   |
| <b>Minimum Increment</b>                       | <ul style="list-style-type: none"> <li>• <b>CLOB:</b> 100,000</li> <li>• <b>Trading Protocols other than CLOB:</b> 0.01</li> </ul>   |
| <b>Minimum Size</b>                            | <ul style="list-style-type: none"> <li>• <b>CLOB:</b> 100,000</li> <li>• <b>Trading Protocols other than CLOB:</b> 0.01</li> </ul>   |
| <b>Trading Conventions</b>                     | <ul style="list-style-type: none"> <li>• Pay Fixed, Receive Float.</li> <li>• Receive Fixed, Pay Float.</li> </ul>   |
| <b>Trade Start Types</b>                       | <ul style="list-style-type: none"> <li>• <b>Spot:</b> A new swap where the Effective Date is T+0 from the trade date.</li> <li>• <b>Non-Spot:</b> Any date where the effective date is a date other than the spot date.</li> </ul>   |
| <b>Fixing Offset</b>                           | 0 to 10 days   |
| <b>Payment Conventions</b>                     | Fixed Leg <ul style="list-style-type: none"> <li>• Payment Frequency: Semi-Annual</li> <li>• Day Count Conventions: ACT/365F</li> <li>• Business Calendar: Toronto</li> <li>• Business Day Conventions: Modified</li> </ul> Following Floating Leg <ul style="list-style-type: none"> <li>• Payment/Resets: Quarterly, Semi-Annual</li> <li>• Day Count Conventions: ACT/365F</li> <li>• Business Calendar: Toronto</li> <li>• Business Day Conventions: Modified Following</li> </ul> |
| <b>Swap Tenor</b>                              | The duration of time from the effective date to the maturity date. A contract can have a Tenor from 28 days to as long as 41 years.  |
| <b>Effective Date</b>                          | Unadjusted date at which obligations under the swap come into effect.  |
| <b>Maturity/Expiration Date</b>                | Unadjusted date at which the obligations under the swap stop being effective.  |
| <b>Final Contractual Settlement Date</b>       | Expiration Date  |
| <b>Payment Lag</b>                             | <ul style="list-style-type: none"> <li>• <b>Fixed Leg:</b> 0 days</li> <li>• <b>Floating Leg:</b> 0 days</li> </ul>  |
| <b>Settlement Method</b>                       | Financially Settled  |
| <b>Settlement Procedure</b>                    | As determined by Clearing House or Bilateral   |
| <b>Settlement Currency</b>                     | CAD  |
| <b>“Made Available to Trade” Determination</b> | None   |
| <b>Mandatory Clearing Determination</b>        | None   |
| <b>Trading Hours</b>                           | 00:01 -24:00 Sunday-Friday Eastern Time  |
| <b>Clearing House</b>                          | Chicago Mercantile Exchange, Inc.; <del>LCH- Clearnet Ltd.</del>   |
| <b>Block Size</b>                              | As set forth in Appendix F to Part 43 of the CFTC Regulations.   |
| <b>Speculative Limits</b>                      | As set forth in Part 150 of the CFTC Regulations   |
| <b>Reportable Levels</b>                       | As set forth in CFTC Regulation 15.03  |