

November 26, 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. Issuance of BSEF Notice to Participants 2024-R-17

Ladies and Gentlemen:

Bloomberg SEF LLC (“**Bloomberg SEF**”) is certifying to the U.S. Commodity Futures Trading Commission (“**CFTC**” or “**Commission**”) the (i) issuance of BSEF Notice to Participants 2024-R-17 regarding Rule 522.A of the Rulebook.

This Notice to Participants is effective on December 11, 2024. A copy of the Notice is attached as **Exhibit A**.

Bloomberg SEF reviewed the swap execution facility core principles (“**Core Principles**”) as set forth in the Commodity Exchange Act (“**Act**” or “**CEA**”) and CFTC Regulations and identified that the amendment of Rule 522. A may have some bearing on the following CFTC Regulations and Core Principles:

- **CFTC Regulation 37.9 Methods of Execution for required and Permitted Transactions:** Notice 2024-R-17 provides guidance regarding protocols for executing a transaction on the CLOB.
- **Monitoring of Trading and Trade Processing (Core Principle 4):** Notice to Participants 2024-R-17 provides guidance for Participants on the regulatory requirements intended for Required Transactions and Cleared Swaps. It is intended to assist Participants with remaining in compliance.

Bloomberg SEF certifies that: (i) the Notice to Participants complies with the Act and the Commissions regulations thereunder, and (ii) a notice and copy of this submission has been concurrently posted on Bloomberg SEF’s website. There were no substantive opposing view to the Notice to Participants.

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

Very truly yours,



Daniel Glatter  
Chief Compliance Officer

Bloomberg SEF LLC  
731 Lexington Avenue  
New York, NY 10022

**Enclosure**

**Bloomberg SEF LLC**  
**Notice to Participants 2024-R-17**

<b>Platform MIC</b>	BBSF
<b>Subject</b>	<b>Interpretive Guidance: Execution of Transactions on CLOB</b>
<b>Rule References</b>	BSEF Rule 522.A
<b>Date of Notice to Participants</b>	November 25, 2024
<b>Notice to Participants Number</b>	2024-R-17
<b>Effective Date</b>	December 11, 2024

BSEF offers an anonymous CLOB for cleared credit and rate Swaps as provided in Rule 522.A.

Participants are reminded that in order to execute a transaction on the CLOB, a Participant must clear such transaction in (a) its own account at the applicable Clearing House or (b) an account in the Participant's name maintained by a Clearing Member of the applicable Clearing House.

Capitalized terms used, but not defined herein, have the meanings assigned to them in the Bloomberg SEF Rulebook, which is available at <https://www.bloomberg.com/professional/product/sefcompliance/>.