

November 25, 2024

Submitted via Portal

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

Re: CFTC Regulation 40.6(d): Weekly Notification of Rule Amendments
BSEF Submission No. 2024-R-16

Ladies and Gentlemen:

Bloomberg SEF LLC (“**BSEF**”) is certifying to the U.S. Commodity Futures Trading Commission (“**CFTC**” or “**Commission**”) this Weekly Notification of the following rule amendments issued during the week of November 25, 2024.

Rulebook Chapter	Rule	Amendment Explanation
Chapter 1. Definitions	Definition of “Qualified Account Manager”	The Commission adopted technical amendments to CFTC Regulation 1.35 which required a revision to the referenced CFTC Regulations in the BSEF Rulebook. ¹
Chapter 5. Trading Practices, Reporting, Clearing and Business Conduct	Rule 528. Bunched Orders and Orders Eligible for Post-Execution Allocation.	The Commission adopted technical amendments to CFTC Regulation 43.6 which required a revision to the referenced CFTC Regulations in the BSEF Rulebook. ²

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

BSEF 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.

¹ See 89 FR 78810, Sept. 26, 2024, <https://www.govinfo.gov/content/pkg/FR-2024-09-26/pdf/2024-21682.pdf>

² See 89 FR 78814, Sept. 26, 2024, <https://www.govinfo.gov/content/pkg/FR-2024-09-26/pdf/2024-21682.pdf>

Bloomberg

Bloomberg SEF LLC

731 Lexington Avenue
New York, NY 10022

Tel +1 212 318 2000
bloombergsef.com

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
731 Lexington Avenue
New York, NY 10022

Enclosure

#600870106v1

Exhibit A

BLOOMBERG SEF LLC RULEBOOK

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the parties to a Swap that legally binds the parties to such Swap shall not be considered a Pre-Execution Communication.

“President” means the individual appointed by the Board as BSEF’s chief executive officer in accordance with the Operating Agreement, with the duties and responsibilities as may be prescribed by the Board from time to time as set forth in Rule 208.

“Prime Broker” means a Person that acts as credit counterparty for transactions executed on the SEF in the name and on behalf of such Person by its client or an agent of its client that is a BSEF Participant and that has authorized a Participant to send RFQs, place Orders or enter into Trades in the name and on behalf of such Person.

“Prime Broker Trade” means a Trade in a Non-Cleared Swap where one Counterparty is a Prime Broker and the other is a Participant with which the Prime Broker has a Non-Cleared Swap Agreement. Only a Permitted Transaction can be a Prime Broker Trade.

“Proprietary Account” has the meaning set forth in CFTC Regulation 1.3(y).

“Public Director” means a Person that meets the qualifications described in Rule 207(e).

“Qualified Account Manager” means any Person that is either: (A) a commodity trading advisor registered pursuant to Section 4n of the Act, or exempt from registration under the Act, or a principal thereof, who has discretionary trading authority or directs client accounts; (B) an investment adviser who has discretionary trading authority or directs client accounts and satisfies the criteria of CFTC Regulations § 4.7(a)(~~26~~)(~~v~~i)(G); or (C) a foreign person who performs a similar role or function as the persons described in sub-paragraphs (A) or (B) above and is subject as such to foreign regulation.

“Regulatory Oversight Committee” means the committee of the Board constituted in accordance with Rule 204.

“Regulatory Services Agreement” means the agreement between BSEF and the Regulatory Services Provider whereby the Regulatory Services Provider provides market surveillance and trade practice surveillance functions as well as other compliance-related services to the SEF operated by BSEF.

“Regulatory Services Provider” means the National Futures Association (“NFA”), the organization which provides regulatory services to BSEF pursuant to a Regulatory Services Agreement.

RULE 528. Bunched Orders and Orders Eligible for Post-Execution Allocation

(a) Only the following categories of Persons may place a Bunched Order to be allocated post-execution on the SEF Platform or that is subject to BSEF Rules:

(i) A commodity trading advisor registered with the Commission pursuant to the Act or excluded or exempt from registration under the Act or the CFTC Regulations, except for entities exempt under CFTC Regulation 4.14(a)(3);

(ii) An investment adviser registered with the SEC pursuant to the Investment Advisers Act of 1940 or with a state pursuant to applicable state law or excluded or exempt from registration under the Investment Advisers Act of 1940 or applicable state law or rule;

(iii) A bank, insurance company, trust company, or savings and loan association subject to federal or state regulation;

(iv) A foreign adviser that exercises discretionary trading authority solely over the accounts of non-U.S. persons, as defined in CFTC Regulation 4.7(a)(~~iv~~4);

(v) A Futures Commission Merchant registered with the Commission pursuant to the Act; or

(vi) An Introducing Broker registered with the Commission pursuant to the Act.

(b) Bunched Orders must be allocated and recorded in accordance with CFTC Regulation 1.35(b)(5) and the NFA's Interpretative Notice related to Compliance Rule 2-10.

(c) Bunched Orders may be entered using an Account Series Designation or suspense account number; provided, however, that:

(i) The Order is being placed by an Account Manager for multiple accounts eligible for post-execution allocation; and

(ii) An Account Manager that places a Bunched Order shall keep and must make available upon request of any representative of the Commission, the United States Department of Justice, BSEF or other appropriate regulatory agency, records sufficient to demonstrate that all allocations meet the standards of CFTC Regulations 1.35(b)(5)(iv) and to permit the reconstruction of the handling of the order from the time of placement by the Account Manager to the allocation to individual accounts.

RULE 529. Orders Entered Prior to SEF Opening

Participants are prohibited from sending any Request for Quote or Order or using an Order Book or any other facility of BSEF prior to the opening of the trading session.