

Bloomberg SEF LLC
731 Lexington Avenue
New York, NY 10022

March 14, 2018

FOIA CONFIDENTIAL TREATMENT REQUEST

Submitted via FedEx, the Portal and via email

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

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-0318-0001" and ending with "BSEF-0318-0007."

[signature page follows]

Please acknowledge receipt of this letter by stamping the enclosed copy of this letter and returning it via the pre-paid envelope included with the materials.

Please contact the undersigned at (212) 617-8302 with any questions regarding this matter.

Thank you for your attention to this matter.

Very truly yours,



Gregory Dumark
Chief Compliance Officer

Bloomberg SEF LLC
731 Lexington Avenue
New York, NY 10022

cc: Abigail Knauff, Division of Market Oversight, U.S. Commodity Futures Trading
Commission (Email: aknauff@cftc.gov)

Annex A
Confidential Information

Name of Confidential Information	Identifying Number and Code
Rule Amendment Self-Certification	BSEF-0318-0001–BSEF-0318-0007

March 14, 2018

Submitted via Portal

Melissa Jurgens
Office of the Secretariat
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581
via email: submissions@cftc.gov

Re: Bloomberg SEF LLC – Rule Amendment – Revised Fees (BSEF-2018-R-01)

Dear Sir or Madam:

Pursuant to Section 5c(c) of the Commodity Exchange Act (the “Act”) and Section 40.6(a) of the regulations of the Commodity Futures Trading Commission (the “Commission”), Bloomberg SEF LLC (“Bloomberg SEF”) hereby notifies the Commission that it has amended its participant fee schedule (the “Participant Fee Schedule”). The amended Participant Fee Schedule will become effective on March 29, 2018.

Capitalized terms used but not defined herein have the meanings assigned to them in Bloomberg SEF’s Rulebook.

A clean copy of the amended Participant Fee Schedule is attached hereto as Exhibit A. A redline of the amended Participant Fee Schedule marked against the Participant Fee Schedule submitted by Bloomberg SEF to the Commission as 2015-R-13 on December 9, 2015 is attached hereto as Exhibit B. The amended Participant Fee Schedule has been implemented in compliance with CFTC Regulation 37.202 and Core Principle 2.

Bloomberg SEF hereby certifies that: (i) the amended Participant Fee Schedule complies with the Act and the Commission’s regulations thereunder, and (ii) a notice and a copy of this submission with redacted confidential information is being concurrently posted on Bloomberg SEF’s website. There were no substantive opposing views to the amendments to the Participant Fee Schedule.

Please contact the undersigned at (212) 617-8302 with any questions regarding this matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Gregory Dumark". The signature is fluid and cursive, with the first name "Gregory" and last name "Dumark" clearly distinguishable.

Gregory Dumark
Chief Compliance Officer

Bloomberg SEF LLC
731 Lexington Avenue
New York, NY 10022

Enclosures

Exhibit A
Participant Fee Schedule - Clean

[Redacted]

Exhibit B
Participant Fee Schedule – Redline

Redline marked against 2015-R-13, submitted to the Commission on December 9, 2015

[Redacted]