SUBMISSION COVER SHEET IMPORTANT: Check box if Confidential Treatment is requested **Registered Entity Identifier Code (optional):** Organization: Bloomberg SEF LLC **DCO** SDR | ✓ | SEF Please note - only ONE choice allowed. Filing as a: **DCM** Filing Date (mm/dd/yy): 08/01/2023 **Filing Description:** CFTC Regulation 40.6(a). Product-Related Amendments to the BSEF LLC Rulebook **SPECIFY FILING TYPE** Please note only ONE choice allowed per Submission. **Organization Rules and Rule Amendments** Certification § 40.6(a) Approval § 40.5(a) Notification § 40.6(d) Advance Notice of SIDCO Rule Change § 40.10(a) SIDCO Emergency Rule Change § 40.10(h) **Rule Numbers:** Please note only ONE product per Submission. **New Product** Certification § 40.2(a) Certification Security Futures § 41.23(a) Certification Swap Class § 40.2(d) Approval § 40.3(a) **Approval Security Futures** § 41.23(b) Novel Derivative Product Notification § 40.12(a) Swap Submission § 39.5 **Official Product Name: Product Terms and Conditions (product related Rules and Rule Amendments)** Certification § 40.6(a) l√l Certification Made Available to Trade Determination § 40.6(a) **Certification Security Futures** § 41.24(a) Delisting (No Open Interest) § 40.6(a) Approval § 40.5(a) Approval Made Available to Trade Determination § 40.5(a) Approval Security Futures § 41.24(b) Approval Amendments to enumerated agricultural products § 40.4(a), § 40.5(a) "Non-Material Agricultural Rule Change" § 40.4(b)(5) Notification § 40.6(d) Official Name(s) of Product(s) Affected: See Filing. Rule Numbers: See Filing.

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Bloomberg

August 1, 2023

Submitted via Portal

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

> CFTC Regulation 40.6(a) Certification. Product-Related Amendments to the BSEF Re:

LLC Rulebook

BSEF Submission No. 2023-R-09

Ladies and Gentlemen:

Bloomberg SEF LLC ("BSEF") is certifying to the U.S. Commodity Futures Trading Commission ("CFTC" or "Commission") the amending of Rules 1318 and 1333 (collectively, "Rule Amendments"). The Rule Amendments are effective on August 14, 2023. A concise explanation of the Rule Amendments is in the below table.

Contract	Rulebook Chapter	Amendment Explanation
USD SOFR OIS Compound Fixed-to-Floating Swap Contract	Rule 1318	Amending the contract in light of the Commission's approval of a made-available-to-trade (MAT) determination.
GBP OIS SONIA Compound Fixed-to-Floating Swap Contract	Rule 1333	Amending the contract in light of the Commission's approval of a made-available-to-trade (MAT) determination.

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

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 terms in Rules 1318 and 1333 may have some bearing on the following core principle:

• Swaps Not Readily Susceptible to Manipulation (Core Principle 3): BSEF believes that Rule Amendments do not change the prior determination that swaps listed in Rules 1318 and Rule 1333 are not readily susceptible to manipulation.

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

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.

Very truly yours,

Dan Glatter

Chief Compliance Officer

Bloomberg SEF LLC 731 Lexington Avenue New York, NY 10022

Enclosure

Exhibit A

RULE 1318. USD SOFR OIS **Compound** Fixed-to-Floating Swap Contract

Contract Overview	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.	
Ticker	USD SOFR OIS Compound [Tenor]	
Currency	USD	
Floating Reference Rate	SOFR (Secured Overnight Financing Rate)	
Index		
Reference Rate Term Value	1 day	
Fixed Rate	Par; Custom Coupon; the then-current rates for Market Agreed Coupon ("MAC")	
Notional	Fixed Notional/Constant Notional Schedule	
Quoting Convention and	As agreed by the counterparties Coupon/fixed rate; Upfront fee and coupon/fixed rate	
Minimum Increment		
Minimum Increment	• CLOB: \$100,000	
	Non-CLOB: \$0.01	
Minimum Size	As agreed by the counterparties	
William Size	• CLOB: \$100,000	
	• <u>Non-CLOB: \$0.01</u>	
Trading Conventions	Buy =	
	Pay Fixed, Receive Float.	
	Sell =	
	Receive Fixed, Pay Float.	
Swap Conventions	Fixed Leg	
	Payment: Monthly, Quarterly, Monthly, Semi-Annual, Annual	
	 Day Count Conventions: ACT/360 or as agreed by the counterparties., ACT/365.FIXED, 	
	ACT/ACT.ISDA, 30/360	
	Holiday Calendars: U.S. Government Securities Business Day Business Calendars: New	
	York/USNY; selected other calendars supported by a clearing house	
	Business Day Conventions: Modified Following with adjustment to period end dates.	
	Following, Preceding, None	
	Floating Leg	
	Payment/Resets: Daily, Monthly, Quarterly, Monthly, Semi-Annual, Annual, At Maturity	
	Day Count Conventions: ACT/360, or as agreed by the counterparties	
	Business Calendar: New York/USNY; selected calendars supported by a clearing house	
	Holiday Fixing Calendars: U.S Government Securities Business Day	
	Business Day Conventions: Modified Following with adjustment to period end dates.	
	Following, Preceding, None	
Swap Tenor	The duration of time from the effective date to the maturity date. A contract can have a tenor from 287	
Swap Tenor	days to up to 50 years.	
Effective Date	The date on which parties begin calculating accrued obligations, such as fixed and floating interest rate	
Effective Date	payments (i.e., the start date of the swap).	
Trade Start Types	Spot: A new swap where the Effective Date is T+2 from the trade date.	
<u> </u>	Non-Spot: Any date where the Effective Date is a date other than the spot date.	
T: • ee .		
Fixing offset	0 to 10 days	
Maturity/Expiration Date	The final date on which the obligations no longer accrue, and the final payment occurs.	
Final Contractual Settlement Date	Expiration Date	
Periodic Settlement:		
	Fig. 17. The second Fig. 17. The second Fig. 17.	
Payment and Resets	• <u>Fixed Leg</u> : The payment amount of the Fixed Leg is based on the following: Notional, Payment	
	Frequency, Day Count Convention and Fixed Interest Rate.	
	• <u>Floating Leg</u> : The payment amount of the Floating Leg is based on the following: Notional,	
	Payment Frequency, Day Count Convention, Floating Interest Rate Index and Floating Reset	
	Dates.	
	 Payments are settled in accordance with the payment frequency of the swap. 	
	No optionality.	
Payment Lag	• Fixed Leg: 0 or 2 days	
I My ment Dag		
	Floating Leg: 2 days	
Delivery Type	Physical Country of the Country of t	
First Fixing Date	The first SOFR Fixing Date is equal to the effective date of the swap.	
Trade Start Types	Spot: A new swap where the Effective Date is T+2 from the trade date.	

	Non-Spot: Any date where the Effective Date is a date other than the spot date.	
Settlement Procedure	As determined by the Clearing House or bilateral	
Settlement Currency	USD	
"Made Available to Trade"	See https://www.cftc.gov/IndustryOversight/IndustryFilings/index.htm > Products > Swaps Made	
Determination	Available to Trade	
Mandatory Clearing	See https://www.cftc.gov/IndustryOversight/IndustryFilings/index.htm > Products > Swaps Subject to	
Determination	Clearing requirements	
Trading Hours	00:01 –_24:00 SundayFriday (Eastern Time)	
Clearing Venue	Chicago Mercantile Exchange, Inc.; LCH.Clearnet Ltd.; Eurex Clearing Aktiengesellschaft; or	
	Bilateral	
Block Size	As set forth in Appendix F to Part 43 of the CFTC Regulations.	
Speculative Limits	As set forth in Part 150 of the CFTC Regulations.	
Reportable Levels	As set forth in CFTC Regulation 15.03	

RULE 1333. GBP OIS SONIA **Compound** Fixed-to-Floating Swap Contract

Contract Oraci	The second secon
Contract Overview	An agreement to exchange a stream of cash flows by applying a fixed and floating interest rate to a specified
m: 1	notional over a term to maturity.
Ticker	GBP SWAP vs SON Compound [tenor] Tenor]
Currency	GBP
Floating Reference Rate	SONIA
Index	
Reference Rate Term Value	1 day
Fixed Rate	Par; Custom coupon; the then-current rates for Market Agreed Coupon ("MAC")
<u>Notional</u>	Fixed Notional/Constant Notional Schedule
Quoting Convention	Coupon/fixed rate; Upfront fee and coupon/fixed rate
Minimum Increment	• <u>CLOB: GBP 100,000</u>
	Non-CLOB: GBP 0.01
Contract Size	As agreed by counterparties
Minimum Size	As agreed by counterparties
	• CLOB: GBP 100,000
	=
m 11 G 41	-
Trading Conventions	Buy -
	• Pay Fixed, Receive Float.
	Sell =
	Receive Fixed, Pay Float-
Swap Conventions	Fixed Leg
•	Payment: Monthly, Quarterly, Annual, Semi-Annual, Annual
	• <u>Day Count Conventions</u> : ACT/360, ACT/365.FIXED, ACT/360ACT.ISDA, 30/360
	 Holiday Calendar: London Business Calendars: London/GBLO; selected other calendars
	supported by a clearing house
	Business Day Conventions: Modified Following with adjustment to period end dates.
	Following, Preceding, None
	I tollowing, I tol
	Floating Leg
	 Payment/Resets: Monthly, Quarterly, Annual, Semi-Annual, Annual
	• Day Count Conventions: ACT/365, ACT/360, 30/360.FIXED
	Holiday Business Calendar: London/GBLO; selected other calendars supported by a
	<u>clearing house</u>
	• <u>Fixing Calendar</u> : London/ <u>GBLO</u>
	 Business Day Conventions: Modified Following with adjustment to period end dates.
	Following, Preceding, None
~ ~	
Swap Tenor	The duration of time from the effective date to the maturity date. A contract can have a Tenor from 57 days
Eee 1. F.	to up to 50 years.
Effective Date	The date on which parties begin calculating accrued obligations, such as fixed and floating interest rate
TP 1 C4 4 TP	payments. Also known as (i.e., the start date of the swap).
Trade Start Types	• Spot: A new swap where the Effective Date is T+0 from the trade date.
	Non Spot: Any date other than the effective date.
Fixing offset	<u>0 to 10 days</u>
Maturity/Expiration Date	The final date on which the obligations no longer accrue, and the final payment occurs.
Final Contractual	Expiration Date
Settlement Date	
Periodic Settlement:	
Payment and Resets	• <u>Fixed Leg</u> : The payment amount of the Fixed Leg is based on the following: Notional, Payment
	Frequency, Day Count Convention and Fixed Interest Rate.
	Floating Leg: The payment amount of the Floating Leg is based on the following: Notional,
	Payment Frequency, Day Count Convention, Floating Interest Rate Index and Floating Reset Dates.
	 Payments are settled in accordance with the payment frequency of the swap.
	No optionality.
Payment Lag	Fixed Leg: 0 days
	• Floating Leg: 0 days
Delivery Type	Physical
	1 Physical

First Fixing Date	The first SONIA Fixing Date is equal to the effective date of the swap.
Trade Start Types	Spot:
	• A new swap where the Effective Date is T+0 from the trade date.
	Non Spot
	Any date other than the effective date.
Settlement Procedure	As determined by the Clearing Venue House or Bilateral
Settlement Currency	GBP
"Made Available to Trade"	See https://www.cftc.gov/IndustryOversight/IndustryFilings/index.htm > Products > Swaps Made Available to
Determination	Trade
Mandatory Clearing	See https://www.cftc.gov/IndustryOversight/IndustryFilings/index.htm. > Products > Swaps Subject to
Determination	Clearing requirements
Trading Hours	00:01 – 24:00 Sunday – Friday Eastern Time
Clearing House	Chicago Mercantile Exchange, Inc.; LCH.Clearnet Ltd.; Eurex Clearing Aktiengesellschaft; or Bilateral
Block Size	As set forth in Appendix F to Part 43 of the CFTC Regulations.
Speculative Limits	As set in Part 150 of the CFTC Regulations.
Reportable Levels	As set in CFTC Regulation 15.03.

RULE 1318. USD SOFR OIS Compound Fixed-to-Floating Swap Contract

Contract Overview	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.		
Ticker	USD SOFR OIS Compound [Tenor]		
Currency	USD		
Reference Rate	SOFR (Secured Overnight Financing Rate)		
Reference Rate Term Value	1 day		
Fixed Rate	Par; Custom Coupon; the then-current rates for Market Agreed Coupon ("MAC")		
Notional	Fixed Notional/Constant Notional Schedule		
Quoting Convention	Coupon/fixed rate; Up front fee and coupon/fixed rate		
Minimum Increment	• <u>CLOB</u> : \$100,000		
	• <u>Non-CLOB</u> : \$0.01		
Minimum Size	• <u>CLOB</u> : \$100,000		
	• <u>Non-CLOB</u> : \$0.01		
Trading Conventions	Pay Fixed, Receive Float.		
	Receive Fixed, Pay Float.		
Swap Conventions	Fixed Leg		
	Payment: Monthly, Quarterly, Monthly, Semi-Annual, Annual		
	Day Count Conventions: ACT/360, ACT/365.FIXED, ACT/ACT.ISDA, 30/360		
	Business Calendars: New York/USNY; selected other calendars supported by a clearing		
	house		
	Business Day Conventions: Modified Following, Following, Preceding, None		
	Floating Leg		
	Payment/Resets: Monthly, Quarterly, Monthly, Semi-Annual, Annual, At Maturity		
	Day Count Conventions: ACT/360		
	Business Calendar: New York/USNY; selected calendars supported by a clearing house		
	Fixing Calendars: U.S Government Securities Business Day		
	Business Day Conventions: Modified Following, Following, Preceding, None		
Swap Tenor	The duration of time from the effective date to the maturity date. A contract can have a tenor from 7 days to		
	up to 50 years.		
Effective Date	The date on which parties begin calculating accrued obligations, such as fixed and floating interest rate		
	payments (i.e., the start date of the swap).		
Trade Start Types	• <u>Spot</u> : A new swap where the Effective Date is T+2 from the trade date.		
	Non-Spot: Any date where the Effective Date is a date other than the spot date.		
Fixing offset	0 to 10 days		
Maturity/Expiration Date	The final date on which the obligations no longer accrue, and the final payment occurs.		
Final Contractual	Expiration Date		
Settlement Date			
Periodic Settlement:	• <u>Fixed Leg</u> : The payment amount of the Fixed Leg is based on the following: Notional, Payment		
Payment and Resets	Frequency, Day Count Convention and Fixed Interest Rate.		
	Floating Leg: The payment amount of the Floating Leg is based on the following: Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index and Floating Reset		
	Dates.		
	Payments are settled in accordance with the payment frequency of the swap.		
	No optionality.		
Payment Lag	Fixed Leg: 0 or 2 days		
1 ayment Lag	• Floating Leg: 2 days		
Dolinow Type			
Delivery Type Settlement Procedure	Physical As determined by the Clearing House or bilateral		
	USD		
Settlement Currency "Made Available to Trade"	See https://www.cftc.gov/IndustryOversight/IndustryFilings/index.htm>Products>Swaps Made Available		
Determination	to Trade		
Mandatory Clearing	See https://www.cftc.gov/IndustryOversight/IndustryFilings/index.htm > Products > Swaps Subject to		
Determination	Clearing requirements		
Trading Hours	00:01 – 24:00 Sunday – Friday (Eastern Time)		
Clearing Venue	Chicago Mercantile Exchange, Inc.; LCH.Clearnet Ltd.; Eurex Clearing Aktiengesellschaft; or Bilateral		
Block Size	As set forth in Appendix F to Part 43 of the CFTC Regulations.		
Speculative Limits	As set forth in Part 150 of the CFTC Regulations.		
Reportable Levels	As set forth in CFTC Regulation 15.03.		
reportable Levels	As sociotin in of to regulation 13.03.		

RULE 1333. GBP OIS SONIA Compound Fixed-to-Floating Swap Contract

Contract Overview	An agreement to exchange a stream of cash flows by applying a fixed and floating interest rate to a specified	
Contract Overview	notional over a term to maturity.	
Ticker	GBP SWAP vs SON Compound [Tenor]	
	1 0 1	
Currency	GBP	
Reference Rate	SONIA	
Reference Rate Term Value	1 day	
Fixed Rate	Par; Custom coupon; the then-current rates for Market Agreed Coupon ("MAC")	
Notional	Fixed Notional/Constant Notional Schedule	
Quoting Convention	Coupon/fixed rate; Up front fee and coupon/fixed rate	
Minimum Increment	• <u>CLOB</u> : GBP 100,000	
	• <u>Non-CLOB</u> : GBP 0.01	
Minimum Size	• <u>CLOB</u> : GBP 100,000	
	• Non-CLOB: GBP 0.01	
Trading Conventions	Pay Fixed, Receive Float.	
	Receive Fixed, Pay Float	
Swap Conventions	Fixed Leg	
	Payment: Monthly, Quarterly, Semi-Annual, Annual	
	Day Count Conventions: ACT/360, ACT/365.FIXED, ACT/ACT.ISDA, 30/360	
	Business Calendars: London/GBLO; selected other calendars supported by a clearing house	
	Business Day Conventions: Modified Following, Following, Preceding, None	
	Floating Leg	
	Payment/Resets: Monthly, Quarterly, Semi-Annual, Annual	
	Day Count Conventions: ACT/365.FIXED	
	Business Calendar: London/GBLO; selected other calendars supported by a clearing	
	house	
	Fixing Calendar: London/GBLO	
G. W.	Business Day Conventions: Modified Following, Following, Preceding, None The desired Following and Following are followed by the following and the following are followed by the followed by the following are followed by the followed by the following are followed by the followed	
Swap Tenor	The duration of time from the effective date to the maturity date. A contract can have a Tenor from 7 days to up	
Tee 11 D	to 50 years.	
Effective Date	The date on which parties begin calculating accrued obligations, such as fixed and floating interest rate	
TE I Ct / TE	payments (i.e., the start date of the swap).	
Trade Start Types	Spot: A new swap where the Effective Date is T+0 from the trade date. State of the Effective Date is T+0 from the trade date.	
	Non Spot: Any date other than the effective date.	
Fixing offset	0 to 10 days	
Maturity/Expiration Date	The final date on which the obligations no longer accrue, and the final payment occurs.	
Maturity/Expiration Date	The final date on which the obligations no longer accrue, and the final payment occurs.	
Final Contractual	Expiration Date	
Settlement Date		
Periodic Settlement:	<u>Fixed Leg</u> : The payment amount of the Fixed Leg is based on the following: Notional, Payment	
Payment and Resets	Frequency, Day Count Convention and Fixed Interest Rate.	
	• <u>Floating Leg</u> : The payment amount of the Floating Leg is based on the following: Notional,	
	Payment Frequency, Day Count Convention, Floating Interest Rate Index and Floating Reset Dates.	
	Payments are settled in accordance with the payment frequency of the swap.	
D (1	No optionality.	
Payment Lag	• <u>Fixed Leg</u> : 0 days	
	Floating Leg: 0 days	
Delivery Type	Physical	
Settlement Procedure	As determined by the Clearing House or Bilateral	
Settlement Currency	GBP	
"Made Available to Trade"	See https://www.cftc.gov/IndustryOversight/IndustryFilings/index.htm Products > Swaps Made Available to	
Determination	Trade	
Mandatory Clearing	See https://www.cftc.gov/IndustryOversight/IndustryFilings/index.htm Products > Swaps Subject to Clearing	
Determination	requirements	
Trading Hours	00:01 – 24:00 Sunday – Friday Eastern Time	
Clearing House	Chicago Mercantile Exchange, Inc.; LCH.Clearnet Ltd.; Eurex Clearing Aktiengesellschaft; or Bilateral	
Block Size	As set forth in Appendix F to Part 43 of the CFTC Regulations.	
Speculative Limits	As set in Part 150 of the CFTC Regulations.	

Reportable Levels	As set in CFTC Regulation	15.03
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