

February 23, 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(a) Certification. Issuance of BSEF Notice to Participants 2024-R-04

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-04 regarding Rule 516 and 516.A of the Rulebook and (ii) withdrawal of Notice to Participants 2020-1 and 2023-R-11.

This Notice to Participants is effective on **March 08, 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 terms in Rule 516 and 516.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-04 provides guidance regarding execution protocols for Correcting Trades and Offsetting Trades.
- **Monitoring of Trading and Trade Processing (Core Principle 4):** Notice to Participants 2024-R-04 provides guidance for Participants on the regulatory requirements intended for Offsetting Trades and Correcting Trades. 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

Exhibit A

Bloomberg SEF LLC

Notice to Participants – 2024-R-04

Bloomberg SEF Rules 516 and 516.A: Notification of Action Taken and Trade Review -- Cleared Swaps

This Notice to Participants 2024-R-04 supersedes Notices to Participants 2020-1 and replaces Notice to Participants 2023-R-11. Notices to Participants 2020-1 and 2023-R-11 are therefore withdrawn.

An Error Trade executed on BSEF on a non-anonymous basis can be corrected by Participants as set forth in BSEF Rule 516 and Rule 516.A, by using RFQT to send an RFQ to the other Participant affected by the Error Trade and either (i) indicating that the potential trade is a “Correcting Trade” or “Offsetting Trade” in the RFQ message (“Ticket Notification”) or (ii) by calling 1-212-617-1530 to notify BSEF of the execution of an Offsetting Trade and/or Correcting Trade within **24 hours** after the execution of such Offsetting and/or Correcting Trade as provided in Rule 516.A (“Voice Notification”). In the case of a Ticket Notification, BSEF will provide “Correcting Trade” and/or “Offsetting Trade” indicators to a Recipient Participant in the RFQT message. Participants may pre-arrange an Offsetting Trade and/or Correcting Trade in accordance with Rule 531.B (Trade Correction).

Using a Ticket Notification or a Voice Notification will constitute notice to BSEF’s Compliance Department of the execution of an Offsetting Trade and/or Correcting Trade. The trades will be subject to an *ex post facto* review by the Compliance Department as set forth in Rule 516.A(a)(iv). Upon request of the Compliance Department, a Participant shall provide details sufficient to identify the Error Trade, Offsetting Trade, or Correcting Trade (e.g., UTI, FIT/FITDNA key, Swap contract, notional amount, price/spread, Clearing House, and execution time).

A Ticket Notification or Voice Notification must be provided for an Offsetting Trade and/or Correcting Trade regardless of whether the Offsetting Trade and/or Correcting Trade is a Required Transaction or Permitted Transaction. Failure to provide a Ticket Notification or a Voice Notification for any Offsetting Trade or Correcting Trade, including trades that are Permitted Transactions, will constitute a violation of Rule 516 and 516.A, and potentially subject such Participants that failed to provide a Ticket Notification or a Voice Notification to disciplinary action pursuant to the Bloomberg SEF Rulebook.

Participants should be aware that Bloomberg SEF makes available the Correcting Trade and Offsetting Trade indicators in the trading message API sent to Recipient Participants.

Capitalized terms used, but not defined herein, shall have the meanings ascribed to them in the Bloomberg SEF Rulebook.

Effective Date: **March 08, 2024**