

May 12, 2023

Submitted via Portal

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

Re: Bloomberg SEF LLC – Certification 2023-R-04 (Notice to Participants)

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 (“**CFTC**” or “**Commission**”), Bloomberg SEF LLC (“**Bloomberg SEF**”) hereby notifies the Commission that Bloomberg SEF released the Notice to Participants attached hereto as **Exhibit A** on May 12, 2023.

This Notice informs Participants about issues related to the designation of a Reporting Counterparty for certain swap transactions described in **Exhibit A** and executed on the SEF operated by BSEF.

Bloomberg SEF certifies that: (i) the Notice to Participants complies with the Act and the Commission's 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,



Dan Glatter

Chief Compliance Officer

Bloomberg SEF LLC
731 Lexington Avenue
New York, NY 10022

cc: Brian Robinson, Division of Market Oversight, U.S. Commodity Futures Trading Commission

Enclosures

Exhibit A

Bloomberg SEF LLC

Notice to Participants 2023-2

Re: Designation of a Reporting Counterparty for Certain Swap Transactions Executed on the SEF operated by BSEF.

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

1. Background:

BSEF hereby notifies its Participants that SDR reports and confirmations for certain rate and credit swaps described herein and executed on the SEF operated by BSEF contained a designation of a reporting counterparty that was not calculated in accordance with BSEF Rule 523 when both counterparties were swap dealers (*i.e.*, had the same reporting status under CFTC rule 45.8).

2. Affected Transactions:

Transactions in the following Swaps were affected by the calculation issue described above ("Affected Transactions") and resulted in the corresponding discrepancies in identifying the reporting counterparty are:

- a. *Outright fixed-to-floating interest rate swaps*: BSEF identified the "liquidity provider", rather than 'fixed rate payer', as the reporting counterparty.
- b. *Outright floating-to-floating interest rate swaps*: BSEF identified the "shorter-basis payer", rather than "Reverse ASCII sort, first LEI", as the reporting counterparty.
- c. *Credit default swaps*: BSEF identified the "liquidity provider", rather than the "seller of protection" as the reporting counterparty.

3. Timeframe during which BSEF executed the Affected Transactions:

- a. *Outright fixed-to-floating interest rate swaps*:

Cleared Swaps: May 8, 2018 and January 30, 2023

Non-Cleared Swaps: October 8, 2014 and January 30, 2023

- b. *Outright floating-to-floating interest rate swaps*:

Cleared Swaps: May 8, 2018 and March 30, 2023

Uncleared Swaps: October 8, 2014 and March 30, 2023

- c. *Credit default swaps*:

Cleared Swaps: May 8, 2018 and January 30, 2023

Uncleared Swaps: October 8, 2014 and January 30, 2023

4. Summary:

Due to the issues described in this Notice, Participants are advised to verify that any continuation reporting conducted in accordance with Part 45 of CFTC Regulations was conducted in accordance with Rule 523 of BSEF's Rulebook. Furthermore, BSEF recommends that all Participants review CFTC Staff Advisory on Reporting of Errors and Omissions in Previously Reported Data dated June 10, 2022.

Effective Date: May 12, 2023