



April 6, 2015

**Via Electronic Mail (rule-comments@sec.gov)**

Secretary  
U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549-1090

Re: Comments on Self-Regulatory Organizations; Bloomberg STP LLC; Notice of Filing of Application for Exemption from Registration as a Clearing Agency  
Release No. 34-74394; File No. 600-33

Dear Secretary Fields:

Citigroup Global Markets Inc. ("CGMI") and its US broker dealer affiliates, Automated Trading Desk Financial Services, LLC ("ATD" and, together with CGMI, "Citi")<sup>1</sup> appreciate the opportunity to comment on the above-referenced Application for Exemption from Registration as a Clearing Agency (the "Exemption Application") filed with the U.S. Securities and Exchange Commission (the "SEC" or "Commission") on March 15, 2013.

Citi supports the approval of additional providers of confirmation matching services where the provider seeking SEC exemption from registration as a clearing agency:

- Provides an offering that utilizes and supports the use of standardized message formats and processing procedures ·
- Adheres to interoperability principles with current and future providers to support use by the full spectrum of potential users

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<sup>1</sup> Citigroup Inc. is a diversified global financial services holding company whose businesses provide a broad range of financial services to consumer and corporate clients as well as governments and other institutions. Citi has some 200 million client accounts and does business in more than 100 countries. Citi's primary U.S. broker-dealer subsidiary, Citigroup Global Markets Inc., is registered as a broker-dealer in all 50 states, the District of Columbia, Puerto Rico, Taiwan and Guam, and is also a primary dealer in U.S. Treasury securities and a member of the principal United States futures exchanges. Other Citi affiliates actively engaged in U.S. equity market trading include Automated Trading Desk Financial Services, LLC (ATD). Additional information may be found at [www.citigroup.com](http://www.citigroup.com) or [www.citi.com](http://www.citi.com).

Brent J. Fields  
December 22, 2014  
Page 2

- Accommodates increased volume on a scalable basis in order to function as a continuity of business alternative for all participants in the event other providers experience operational issues or failure .
- Offers the flexibility to adopt shortened settlement cycles, and
- Supports Straight Through Processing (STP) from a process and technology perspective for the end to end trade lifecycle.

We sincerely appreciate the opportunity to comment on securities market issues, and we welcome feedback from all market participants on our above recommendations. Citi looks forward to discussing these matters further with the Commission and its staff. If you have any comments or questions, please do not hesitate to contact me at [REDACTED] or email [REDACTED]

Sincerely,



Thomas Murphy  
Managing Director