



Regulatory Circular RG09-110

Date: October 8, 2009
To: Member Organizations and Clearing Firms
From: Member and Regulatory Services Division
Re: Options Regulatory Fee for Linkage Orders

The Options Regulatory Fee (ORF) applies to all options transactions executed or cleared by a CBOE member that are cleared by OCC in the customer range, excluding Linkage orders. With the implementation of the New Linkage Plan, CBOE is unable to identify trades resulting from Linkage orders. In order to avoid assessing the ORF to such trades, the Exchange is implementing a procedure to issue a credit for Linkage trades.

In order for the Exchange to issue a credit, following the end of each month, the Linkage routing firms must submit a report listing the trades that were routed via standard "front-door" routing mechanisms and were marked to clear by OCC in the customer range. This report should include the following data:

- Executing exchange
- Executing firm clearing number
- CMTA firm clearing number (if applicable)
- Trade Date
- Trade Time
- Buy or sell indicator
- Quantity
- Class and series
- Execution price

The report should also provide a summary, by executing firm, or by CMTA firm, if applicable, of the total number of contracts that were Linkage trades marked to clear in the customer range. It must be submitted to the Exchange within 30 days of the end of the month for which the fees were assessed. This report may be emailed to Angela Davis at Davisa@cboe.com. If the report exceeds 5 megabytes of data, it may be sent on a CD to:

Angela Davis
Regulatory Planning and Process Enablement
Chicago Board Options Exchange
400 S. LaSalle St.
Chicago, IL 60605

Questions regarding this memorandum may be directed to Larry Bresnahan at (312) 786-7713 or to Karen Christiansen at (312) 786-8186.