CBOE Regulatory Circular RG14-139
C2 Regulatory Circular RG14-040

Date: October 1, 2014

To: Trading Permit Holders
From: Regulatory Services Division
RE: Regulatory Request Data Submissions Format

Chicago Board Options Exchange, Incorporated (the "Exchange" or "CBOE") Rule 17.2, Interpretation and Policy .04, requires Trading Permit Holders ("TPHs") to furnish, upon request, in a manner and standard electronic format as prescribed by the Exchange, certain trade data in relation to an investigation, examination or other regulatory request ("regulatory review").[1]

Pursuant to Rule 17.2, Interpretation and Policy .04, the Regulatory Services Division (the "Division") is defining uniform file structures and formats for the submission of data pursuant to a regulatory review. This standardized data will allow the Division to review and analyze requested data in a more efficient and organized manner, which will, in turn, expedite Division review and analysis and ultimately lessen the burden on a TPH with regard to requests for additional information. Not every regulatory review in which data is requested will require submission of data in the standardized formats.

The standard data format includes components applicable to transactions, orders, positions and other elements. A particular request may require submission of an entire data layout or may be limited to only certain components of a layout as specified in the request. As an example, data requested for a Regulation SHO trade blotter pursuant to this rule would require that the data be provided in a comma-separated values (CSV) format, and might request data fields corresponding to the transaction portion of the referenced layout, including trade date, order entry time (milliseconds), cancel time (milliseconds), execution time (milliseconds), unique ticker symbol, side, execution price, event type, unique account identification, user ID, order ID, broker location, quantity, locate source for short sale, number of shares remaining after a partial execution, and the code of the exchange to which an order was routed.

To facilitate the submission of data requested as part of a regulatory review, the Division is also implementing a new secure data transmission process via a secure on-line portal. TPHs will be required to comply with the requirement to provide data in the standardized formats and through the new submission process by January 5, 2015.

Data requests to a TPH by the Exchange will include a description of the data components required and a secure protocol internet link to transmit the requested data. The data transmission process using secure transmission protocols will encrypt the data via a secure password protected link provided to the TPH by the Exchange. The standard data layout by component is currently available at:

http://www.cboe.com/aboutCBOE/legal/regdataformats.aspx

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[1]   C2 Options Exchange, Incorporated ("C2") Chapter 17 incorporates CBOE's Chapter XVII into the C2 Rules.

Additional Information:

Questions regarding this Regulatory Circular should be directed to the Exchange's Regulatory Interpretations and Guidance team at (312) 786-8141 or by email at RegInterps@cboe.com.