



CFE Regulatory Circular 22-001

Date: April 21, 2022

Exchanges: CFE

Markets: Futures

To: Trading Privilege Holders, Clearing Members, Futures Commission Merchants and Foreign Brokers

Re: Migration of File Transfer Servers to Amazon Web Services for XML-based OCR Reporting - Effective May 14, 2022

Updates CFE Regulatory Circular RG19-001

This Regulatory Circular provides notice to Clearing Members, Futures Commission Merchants and Foreign Brokers (collectively “Reporting Firms”) that, effective May 14, 2022, Cboe Futures Exchange, LLC (“CFE” or “Exchange”) is migrating its Secure File Transfer Protocol (“SFTP”) servers currently on the Exchange’s local network to Amazon Web Services (“AWS”).

This migration will impact Reporting Firms utilizing XML-based Ownership and Control Reporting (“OCR”). On the effective date, legacy SFTP hosts will be decommissioned and replaced by servers on AWS. Prior to the effective date, Reporting Firms utilizing XML-based OCR reporting must continue to use the current SFTP servers for OCR reporting.

XML-based Account User Registration and Connectivity Testing

To prevent an interruption in service, and prior to submitting Commodity Futures Trading Commission (“CFTC”) Forms 102A, 102, and 71 to AWS, Reporting Firms using CFE’s existing XML-based OCR reporting¹ are required to register their account user(s) permissioned to provide OCR information to the Exchange. To register, Reporting Firms must provide the below information to the Exchange via the [OCR Portal](#):

- Firm Name
- CFTC Reporting ID
- NFA ID
- Name of User
- Contact Information of User
- Firm Address
- Method(s) for Submitting File(s)

XML-based OCR Reporting Firms

Once approved, account users are sent an email with a link to setup a password for their new account on the OCR Portal. After OCR user login credentials are established, the user must log

¹ This includes Reporting Firms that utilize third party providers to submit OCR Forms via the XML-based option.

into the OCR Portal and register the SFTP public key information for the Reporting Firm submitting XML-based OCR files.

Authentication to the AWS SFTP service will require the OCR user's OCR Portal login name and the firm's private SFTP key provided through the Exchange's OCR Portal.

The new supporting services for file transfer to CFE are detailed below

Transfer Type	Current URL	New URL
Clients sends or retrieves file(s) to/from CFE	xfer.cboe.com	files.cboe.com
	exfer.cboe.com	files.cboe.com
	assrxfer.cboe.com	c-files.cboe.com

From now through May 13, 2022, AWS Cloud will be accessible in parallel with the current file transfer service. During this migration period, all users are expected to establish connectivity through AWS Cloud for the purpose of testing the new network destination in parallel with the legacy system.

XML-based OCR via Third Party Providers

Once approved, a Reporting Firm using a third-party provider(s) with an existing CFE relationship will not need to take any further action. The Exchange will contact Reporting Firms that designate any third-party service provider(s) which does not currently have a relationship with CFE.

Web-based OCR Reporting Firms

As noted in [CFE Regulatory Circular 19-001](#), CFE permits XML-based OCR reporting and web-based OCR reporting. Reporting Firms exclusively reporting OCR via CFE's web-based option are not impacted by the migration and no action is required on their part.

Additional Information

Please contact CFE Regulatory Interpretations at CFEreginterps@cboe.com or 312.786.7229 for additional information.