



CFE Regulatory Circular 26-001

Date: January 27, 2026

Exchanges: CFE

Markets: Futures

To: Futures Commission Merchants, Clearing Members, and Foreign Brokers

Re: Changes to Large Trader Reporting to CFTC and CFE

Effective **March 30, 2026** ("Effective Date"), futures commission merchants, clearing members and foreign brokers (collectively "Reporting Firms") will be required pursuant to [CFE Rule 412B](#) to submit Large Trader Reports ("LTRs") directly to both the Commodity Futures Trading Commission ("CFTC" or "Commission") and Cboe Futures Exchange ("CFE" or "Exchange").

Currently, for CFE products cleared by The Options Clearing Corporation ("OCC"), Reporting Firms submit LTR files to OCC which, in turn, provides the information to the CFTC and CFE.¹ For CFE products cleared by Cboe Clear U.S., LLC ("CCUS"), Reporting Firms submit LTR files both to the CFTC and CCUS, and CCUS, in turn, provides the information to CFE.²

Please note that Reporting Firms must update their LTR reporting to be directly submitted to the CFTC and CFE by the Effective Date. **Failure to do so will result in the inability to submit LTR files for CFE products.**

CFTC Reporting

Beginning on the Effective Date, Reporting Firms will be responsible for submitting LTRs directly to the CFTC for reportable accounts for CFE products. Reporting Firms should file LTRs to the Commission directly through the CFTC's Position Entry for Reportable Traders ("PERT") system. For information on the Commission's PERT system, including registering for the CFTC Portal, please review the [CFTC's FAQ](#).

CFE Reporting

Beginning on the Effective Date, Reporting Firms will be responsible for submitting LTRs directly to CFE for reportable accounts for CFE products. Reporting Firms will have two options to submit LTR files to CFE:³

- Reporting Firms can file LTRs manually through the Exchange's web-based portal (the "Position/OCR Reporting Portal").

¹ Information regarding the current technical and timing guidance regarding LTR reporting for CFE products cleared by OCC is provided in [CFE Regulatory Circular RG25-002](#). This guidance will remain applicable until the Effective Date.

² Information regarding the current technical and timing guidance regarding LTR reporting for CFE products cleared by CCUS is provided in [CFE Regulatory Circular RG25-004](#). This guidance will remain applicable until the Effective Date.

³ The last date when OCC and CCUS (collectively, "Clearing Houses") will accept Reporting Firms' LTRs for CFE products is **March 27, 2026** (for the March 26, 2026 trade date). The Clearing Houses will not accept LTRs for the March 27, 2026 trade date.

- Reporting Firms can file LTRs directly to the Exchange via a Secure File Transfer Protocol (“SFTP”) server on Amazon Web Services (“AWS”).

Both options require Reporting Firms to register on CFE’s Position/OCR Reporting Portal as further described below. Reporting Firms are required to report account position information to CFE for all reportable accounts. The data must be submitted to CFE by 8:00 a.m. Chicago time beginning on the morning of the Business Day following the trade date that establishes the position. Note that CFE will only process the last file submitted by the Reporting Firm prior to the reporting deadline for that trading day.

Registering on CFE’s Position/OCR Reporting Portal

Reporting Firms must be registered to use the Exchange’s [Position/OCR Reporting Portal](#) to report LTRs to the Exchange. Reporting Firms should register as soon as possible to ensure they are ready by the Effective Date.

Reporting Firms that have already registered with CFE for Ownership and Control Reporting (“OCR”) purposes are not required to reregister as firms with existing access will automatically have access to the new Position/OCR Reporting Portal using their current credentials.⁴

To register, Reporting Firms must provide the following information to the Exchange via the [registration screen for the Portal](#):

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

Once approved by the Exchange, account users are sent an email with a link to set a password for their account. Reporting Firms will then have access to the Exchange’s portal for both the manual submission of LTRs and OCR reports.

If a registrant intends to report for more than one Reporting Firm, please contact the CFE LTR OCR team at CFEOCRReg@cboe.com.

File Requirements for LTR Reporting via SFTP

Note that Reporting Firms must use the Exchange’s Position/OCR Reporting Portal to set up the electronic submission of LTRs (and/or OCR files) via CFE SFTP server on AWS.

Reporting Firms that intend on submitting LTRs electronically through the Exchange’s SFTP servers on AWS must provide the SSH public key for the source network from which the data will be transmitted. Reporting Firms provide the SSH public key information by using their login credentials to add or

⁴ The Position/OCR Reporting Portal is the new name of what is currently known as the Ownership and Control Reporting (OCR) Portal. The OCR Portal is being enhanced to accept position reporting and will be renamed to the Position/OCR Reporting Portal on or about the Effective Date.

amend public key information about their networks through the Exchange's Position/OCR Portal. CFE recommends that Reporting Firms generate the SSH public key with rsa-sha2-512 or better.

CFE utilizes the industry standard LTR format as promulgated by the CFTC. Please consult the CFTC website [Large Trader Reporting Program | CFTC](#) for additional information regarding the LTR file requirements. Please note the exchange code for CFE is 'E'.

Production files are required to be submitted with the following filenames: LTR_FIRMID_YYYYMMDD.txt

| File Name Component | Mandatory | Description |
|---------------------|-----------|--------------------------------|
| FIRMID | Yes | CFTC ID for the reporting firm |
| YYYYMMDD | Yes | Trade Date |
| .txt | Yes | The txt file extension |

The network destination servers for LTR file submissions are as follows:

| Transfer Type | Application | URL |
|--|---------------|------------------|
| Clients sends or retrieves file(s) to/from CFE | Production | files.cboe.com |
| | Certification | c-files.cboe.com |

From today through March 27, 2026, the Exchange's certification servers on AWS will be made available for testing.

Additional Information

Please contact CFEOCRReg@cboe.com for questions regarding the Position/OCR Reporting Portal or the new Exchange LTR submission process.

Please refer to CFE rules and to CFTC regulations, including [CFTC Regulation 17.00](#), for additional information regarding LTR requirements.

Failure to provide LTRs as required may result in disciplinary action.

For questions regarding CFE rules, please contact CFE Regulatory Interpretations at CFEreginterps@cboe.com or 312.786.7229.