CFE Regulatory Circular 26-006

Date: **October 26, 2026**

Exchanges: **CFE**

Markets: **Futures**

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

Re: **Unique Instrument Codes**

On April 30, 2024, the Commodity Futures Trading Commission ("CFTC" or "Commission") announced amendments to certain Commission regulations concerning large trader position reporting requirements set forth in CFTC Regulations Part 17.00 ("Final Rule").[1] In accordance with CFTC No-Action Letter No. 26-02 and CFTC Press Release No. 9174-26, futures commission merchants, clearing members, and foreign brokers (collectively "Reporting Firms") that are required to make large trader reports ("LTRs") need to comply with the revised requirements by **July 26, 2027**.[2]

One of the revisions will enable Reporting Firms to include a "Unique Instrument Code" ("UIC") on LTRs in lieu of certain product-related data elements. Cboe Futures Exchange, LLC ("CFE" or "Exchange") is issuing this Regulatory Circular to provide guidance to Reporting Firms regarding access to the UICs assigned by the Exchange. Further guidance regarding other changes to LTR reporting (including test dates) is currently planned for publication in the fourth quarter of 2026.[3]

Unique Instrument Codes

The Part 17 Guidebook published concurrently with the Final Rule permits Reporting Firms to provide the UIC, an exchange-assigned code that serves as a primary key to a product reference file for a particular instrument or contract, in their LTR instead of the underlying product-related data elements it represents.

Effective **October 27, 2026**, the Exchange will make available a daily CSV file containing both the UIC and the underlying product-related data (the "UIC file"; file name: UIC_YYYYMMDD) at the following locations:

- The Unique Instrument Codes (UICs) page of the CFE Regulation website; and
- For Reporting Firms electronically submitting LTRs and Ownership and Control Reports ("OCR") via the CFE SFTP server on Amazon Web Services ("AWS") (files.cboe.com), the daily UIC file will

[1] Large Trader Reporting Requirements, 89 Fed. Reg. 47439 (June 3, 2024). *See* also CFTC Press Release No. 8902-24.

[2] The compliance date under the Final Rule remains June 3, 2026. *See* 89 Fed. Reg. at 47439. CFTC staff has taken a no-action position deferring enforcement pending certain implementation milestones, which CFTC staff expects will result in compliance by July 26, 2027.

[3] To subscribe to CFE circulars and notices, please contact the CFE Trade Desk at cfetradedesk@cboe.com.

be in the Reporting Firm's dedicated "Transfer/Out" folder. Each UIC file will remain available in this folder for 30 days from its original publication date. Reporting Firms that need to establish a new SFTP connection, or register an additional public key for another network, may do so in the Position/OCR Reporting Portal under "SFTP Access" by selecting "Manage SFTP Keys."

A new UIC file, containing only the contracts that were made available for trading that day, will be published after the close of each trading day, generally no later than 5:00 PM Chicago Time.[4]

Additional Information

Please contact CFEOCRReg@cboe.com for questions regarding the Position/OCR Reporting Portal or use of UICs.

Please refer to CFE rules and to CFTC regulations, including CFTC Regulation 17.00, for additional information regarding LTR requirements.

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

[4] Information regarding current technical and timing guidance regarding LTR reporting is provided in CFERG26-001 Changes to Large Trader Reporting to CFTC and CFE.