



Regulatory Circular 25-008

Date: August 21, 2025

Exchanges: Cboe Options, C2 Options, BZX Options and EDGX Options

Markets: Options

To: Trading Permit Holders and Members

Re: Position and Exercise Limit Increases for Options on Certain Exchange Traded Funds - UPDATED¹

The position and exercise limits on the following products have recently changed:

- iShares Bitcoin Trust (IBIT)
- Grayscale Bitcoin Trust (GBTC)
- Grayscale Bitcoin Mini Trust (BTC)
- Bitwise Bitcoin ETF (BITB)

Previously the position and exercise limits for the above-mentioned classes were each fixed at 25,000 contracts. As of August 6, 2025, the four Cboe Options Exchanges' respective rules have been amended to provide that the standard position and exercise limits for equity options apply these classes as set forth in Interpretation and Policy .02 of Cboe Options Rule 8.30.² **Based on the factors set forth in the rule, it is possible that limits greater than 25,000 would be applicable. A limit greater than 25,000 will be based on the most recent six-month trading volume of the underlying security, or the most recent six-month trading volume of the underlying security and the shares currently outstanding as further specified in the rule.**

Please note that position and exercise limits for FLEX Equity Options on IBIT, GBTC, BTC, and BITB are the same as non-FLEX Options on IBIT, GBTC, BTC, and BITB under Cboe Options Rule 8.35(c)(1)(C).³ **Further, however, positions in the FLEX Options must be aggregated with positions in the non-FLEX Options overlying the same security for purposes of calculating position and exercise limits.**

Please note that these position and exercise limits are as prescribed by the Cboe Exchanges only and more restrictive limits may be imposed by other regulators and firms. For instance, Trading Permit Holders and Members (and their customers) are also subject to and must adhere to applicable position and exercise limits of other exchanges or national securities associations, which may be more restrictive.⁴

¹ On August 25, 2025, this Regulatory Circular was updated to remove specific reference to the position and exercise limits as they may be dated and change over time, and to instead add references to the general standard for calculation of the position and exercise limits set forth in the rules.

² Cboe Options Rule 8.30 is incorporated by reference into Chapter 8 of the C2 Options Rulebook. BZX and EDGX Rules 18.7 and 18.9, incorporate the Cboe Options position and exercise limits for any option contract traded by both BZX or EDGX and Cboe Options as applicable. See also Release No. [34-103663](#) (August 8, 2025) ([SR-CBOE-2025-056](#)), the changes of which are incorporated by reference into the C2 Options, BZX and EDGX Rulebooks.

³ Cboe Options also recently amended its rules to permit authorization of trading of FLEX Options on the above-mentioned equity securities. See Release [34-103720](#) (August 15, 2025) ([SR-CBOE-2025-058](#)).

⁴ Position limits are posted on The Options Clearing Corporation's ("OCC") website: [OCC - Position Limits](#).

Additional Information

For additional information on the above-mentioned changes, please refer to Rule Filings SR-CBOE-2025-056 and SR-CBOE-2025-058.

For any questions, please contact Regulatory Interpretations at reginterps@cboe.com or 312.786.8141.