

Regulatory Circular RG15-200

Date: December 31, 2015

To: Trading Permit Holders

From: Regulatory Division

RE: Submission of Daily Equity, Haircut Data and Net Capital Computation

Currently, certain CBOE Trading Permit Holders ("TPHs") are required to submit to CBOE daily equity, haircut data, and/or net capital computations, as applicable. Specifically, TPHs that clear the activity of options market-makers, Designated Primary Market Makers ("DPMs"), self-clearing TPHs, and any other net capital computing broker-dealer for which CBOE is the Designated Examining Authority ("DEA") submit the daily information to CBOE via a Secure File Transfer Protocol ("SFTP"). In connection with a Regulatory Services Agreement between the CBOE and FINRA, effective **February 1, 2016**, applicable CBOE TPHs, or their clearing firms ("TPH Clearing Firms"), will be required to submit the daily information via a secure FINRA portal. **This does not represent a new reporting requirement, but instead represents a change of destination for the data already being received daily by the CBOE. The existing reporting data formats will remain the same.**

To ensure a smooth transition and to enable CBOE and FINRA to perform parallel testing, CBOE TPHs, or their TPH Clearing Firms, will be asked to submit the daily information to **both** CBOE and FINRA via SFTP sites for a brief period of time. The dual submission will be for the period January 11, 2016 through January 29, 2016 (i.e., the parallel testing period), unless otherwise instructed. CBOE TPHs will no longer be required to submit directly to CBOE after the end of the parallel testing period.

In connection with this transition, each TPH or TPH Clearing Firm affected by the transition will be requested to provide the following information to its FINRA Regulatory Coordinator no later than **Friday January 8, 2016**:

- A single Point of Contact with User Name, Email and Phone Number to coordinate the transition.
- Firm's Internet Protocol ("IP") address that will be used to submit to the FINRA SFTP (normally the Production Server).

Your firm's Regulatory Coordinator will be in contact with you if you have not already provided this information.

Additional Information:

Questions on this Regulatory Circular may be directed to your FINRA Regulatory Coordinator or the Regulatory Interpretation and Guidance Line at 312-786-8141 or RegInterps@cboe.com. For technical questions relating to the submission of the data to the FINRA portal, please contact FINRA's Help Desk at 240-386-4141.