

EXECUTIVE SUMMARY

2025 marked 15 years of PTG as well as the start of a new chapter with the organization gaining renewed focus as an independent entity. Through thoughtful discussions on the most pressing issues facing today's markets, PTG delivered on a robust agenda that included more than a dozen comment letters, amicus briefs, and position papers. Priority areas of focus included regulatory proposals on automated trading, equity market structure, cybersecurity, emerging legislation on artificial intelligence, and digital assets.

Member working groups sharpened approaches to public policy issues, identifying opportunities to advance the group's collective interests. Notably, PTG responded via comment letter to the Commodity Futures Trading Commission's (CFTC) request for input on Tokenized Collateral and Stablecoins, as well as filing a response to the latest funding proposal for the Consolidated Audit Trail (CAT) with the Securities and Exchange Commission (SEC).

PTG members also met with key decision-makers, including SEC Commissioners and staff, Treasury staff, members of Congress and their staff, as well as exchange and central counterparty (CCP) leadership teams. This deep level of engagement enabled PTG to continue educating the regulatory and legislative community on the vital role professional liquidity providers play in open and transparent markets.

2025 HIGHLIGHTS

- Submitted 15 letters to regulators, policymakers and exchanges.
- Published one position paper.
- Filed two amicus briefs.
- Participated in 37 meetings with regulators, policymakers and exchanges.
- PTG Members participated in:
 - Nine meetings with SEC Commissioners and staff members.
 - One SEC roundtable.
 - Two meetings with Treasury staff.
 - Nine meetings with Congressional representatives and staff members.
 - 17 meetings with exchange and CCP leadership teams.
- Hosted one media roundtable.
- Hosted two cybersecurity roundtables for PTG members.
- Hosted one industry virtual roundtable discussion on done-away cash Treasury clearing.

MISSION OF PTG

To unite principal trading firms in addressing shared challenges, shaping sound public policy, promoting understanding of their positive market role, and advocating for fair, transparent, and cost-effective global market access.

ADVOCACY GOALS – 2025

1. Continue educating policymakers, including regulators, relevant legislators, and staff.
2. Continue pursuit of additional worthwhile representation opportunities on regulatory advisory committees, panels, and roundtables.
3. Continue to work with equity and futures exchanges on matters of importance to the group.
4. Continue to work with other like-minded trade associations and companies where appropriate on issues of mutual interest.
5. Continue to inform Members and Member offices of our positions on possible legislative initiatives, as well as actions by the regulatory agencies they oversee. Possible legislative initiatives could include:
 - a. Legislation on cryptocurrencies/digital assets.
 - b. Legislation on R&D tax credit.
 - c. Legislation related to SEC regulatory proposals, including equity market structure, dealer registration, FINRA membership, Consolidated Audit Trail, and treasury mandatory clearing.
 - d. Financial transaction tax.
 - e. Legislation aimed at “excessive speculation” in derivatives markets.
 - f. Legislation related to artificial intelligence.
 - g. Other relevant legislation to derivatives/securities regulation.
6. Continue pursuing specific regulatory initiatives including:
 - a. Monitor for rule proposals and oversight developments related to automated trading (CFTC, SEC, Federal Reserve Board, US Treasury, and Exchanges).
 - b. Engagement with regulators on rule proposals for introducing artificial latency mechanisms (CFTC, SEC, and Exchanges).
 - c. Engagement on the SEC’s equity market structure proposals (SEC).
 - d. Engagement regarding other SEC actions including dealer registration (SEC).
 - e. Monitor CCP recovery and resolution developments – including variation margin gains haircutting, waterfall, default auctions, and other issues (CFTC, IOSCO).
 - f. Monitor developments in policies for cybersecurity risks (SEC, CFTC).
 - g. Monitor for any developments on transaction tax (Administration) and carried interest (Treasury).
 - h. Monitor for regulatory developments regarding artificial intelligence (CFTC, SEC, and Administration).
 - i. Monitor regulatory developments in digital asset markets and engage where appropriate (CFTC, SEC, and Administration).

- j. Monitor and engage on other market structure proposals of importance to our members, including 24/7 trading and disintermediation (CFTC, SEC, and Exchanges).

OUTREACH GOALS – 2025

1. Continue to grow social media following.
2. Use Twitter and elink to advance FIA PTG positions and advocacy goals.

PTG ADVOCACY

Committee Participation

- PTG has a representative on the CFTC Energy and Environmental Markets Advisory Committee (EEMAC) and participated in the May 28 meeting.
- PTG has a representative on the CFTC Market Risk Advisory Committee (MRAC). There were no meetings this year.
- PTG has a representative on the CFTC Agricultural Advisory Committee (AAC). There were no meetings this year.
- PTG has a representative on the CFTC Global Markets Advisory Committee (GMAC). There were no meetings this year.

Commodity Futures Trading Commission

- On May 21, FIA and FIA PTG responded to the CFTC Request for Comment on Trading and Clearing of “Perpetual” Style Derivatives in a [joint comment letter](#).
- On May 30, FIA PTG submitted a [comment letter](#) in response to the CFTC Request for Comment on Trading and Clearing Derivatives on a 24/7 Basis.
- On November 26, PTG filed a [comment letter](#) in response to the CFTC’s request for input on Tokenized Collateral and Stablecoins.

Securities and Exchange Commission

- On January 6, the FIA PTG Treasury Market Structure Committee met with SEC Chair Gensler and SEC staff. Both the SEC and FIA PTG shared progress, or lack thereof, on the upcoming Treasury Clearing Mandate.
- On January 24, FIA PTG joined seven trade associations in filing an [extension request](#) with the SEC. The letter requested extensions of at least twelve months for both the cash and repo clearing mandates – currently December 31, 2025, and June 30, 2026, respectively. With respect to the March 31, 2025, Fixed Income Clearing Corporation (FICC) required access and risk management changes set forth in the Clearing Rule, FIA PTG worked with FICC and the other trades to maintain the March 31 deadline for FICC while allowing impacted FICC members additional time to comply. This distinction is very important, as FICC’s implementation of these changes is an essential step towards the expansion of their cross-margin capabilities to include client accounts.

- On January 27, FIA PTG filed a [comment letter](#) with the SEC urging the agency to approve ISE's proposed position and exercise limit increases for options on iShares Bitcoin Trust ETF.
- On February 5, the FIA PTG Digital Assets Committee met virtually with SEC Acting Chair Uyeda. The focus of the meeting was digital assets, but Treasury Clearing was also discussed briefly.
- On February 5, the FIA PTG Digital Assets Committee met virtually with SEC Commissioner Peirce. The focus of the meeting was exclusively digital assets. Commissioner Peirce expanded on her plans for the Crypto Task Force that she had outlined in a statement she had released on February 4. She also encouraged the submission of no-action and exemptive relief requests as well as general input via the newly created Crypto Task Force website.
- On February 26, FIA PTG filed a [comment letter](#) with the SEC in response to IEX's Notice of Filing of a Proposed Rule Change to Adopt Rules to Govern the Trading of Options on the Exchange for a New Facility Called IEX Options. The Proposal extends some of the market structure elements of IEX to this new Options exchange – including the speedbump – accordingly, the letter opposes the Proposal.
- On April 16, the FIA PTG Equity Market Structure Committee and Reg SHO Reform Working Group met virtually with SEC Trading & Markets staff to discuss potential Reg SHO reform recommendations.
- On April 17, FIA PTG filed a [comment letter](#) with the SEC on Nasdaq's efforts to equalize telecommunications provider access and market participant connectivity across Nasdaq's entire data center campus, the "Equalization Project".
- On May 15, the FIA PTG Market Access Committee met with SEC Trading & Markets staff to discuss the most recent [FIA PTG Nasdaq Data Center Equalization Comment Letter](#).
- On June 26, FIA PTG filed a [letter](#) with the SEC on Proposals to Ensure Proper Governance and Lower Costs of the CAT.
- On July 11, FIA PTG submitted a [comment letter](#) in response to the Proposed Rule Change to Amend FINRA Rule 6730 (Transaction Reporting).
- On July 22, representatives of FIA PTG had in-person meetings with Jamie Selway, Director, SEC Division of Trading and Markets and Will Smith, Counsel to SEC Commissioner Peirce. Topics discussed included CAT, Treasury clearing mandate, upcoming Order Protection roundtable, Reg SHO bona fide market maker ambiguity and tokenized securities.
- On August 1, FIA PTG submitted a [letter](#) to the [SEC Crypto Task Force website](#). The letter covered a range of topics including: Security Status Issues; Regulation of Tokenized U.S. Equity Securities; Potential Collateral Efficiencies; and Accounting Considerations.
- On August 6, FIA PTG submitted a [comment letter](#) in support of a Proposed Rule Change to Amend FINRA Rules 6380A and 6380B (Transaction Reporting) to Extend the Trade Reporting Facilities Operating Hours.

- On September 17, FIA PTG submitted a position paper to the SEC, [Regulation NMS: A Renewed Call for Reform](#), in advance of the September 18 SEC Trade-Through Prohibitions Roundtable.
- On September 18, FIA PTG participated on a panel at the SEC Trade-Through Prohibitions Roundtable.
- On October 23, representatives from PTG participated in meetings in DC. Meetings included at the SEC with Chairman Atkins, Commissioner Uyeda and Division of Trading and Markets Director Selway.
- On November 24, PTG filed a [comment letter](#) in response to the latest funding proposal for the Consolidated Audit Trail (CAT).
- On December 18, representatives from the PTG Equity Market Structure and Digital Assets Committees met virtually with SEC Division of Trading and Markets Director Selway and his staff to discuss tokenized equities and planned innovation exemptions.

Other

- On January 22, FIA and FIA PTG, along with several other financial services trade associations, filed an [amicus brief](#) in response to the US Federal Trade Commission's (FTC) appeal of a prior decision involving the FTC's final rule that would ban nearly all noncompete agreements in the US. The appeal is in *Properties of the Village, Inc v. FTC* and is being heard in the US Court of Appeals for the Eleventh Circuit.
- On January 28, the FIA PTG Market Access Committee met virtually with representatives from CME Group to discuss plans for the data center and cloud migrations.
- On February 10, FIA and FIA PTG, along with several other financial services trade associations, filed an [amicus brief](#) in response to another FTC appeal of a prior decision involving the FTC's final rule that would have banned nearly all noncompete agreements in the US.
- On February 12, at the request of Nasdaq, the FIA PTG Market Access Committee met virtually with the exchange to discuss the equalization plan for their NY11 data center. Nasdaq provided a diagram and requested feedback from FIA PTG members on their plans.
- On February 27, ICE hosted a presentation, in-person and virtually, exclusively for FIA PTG Treasury Market Structure Committee members on their Treasury Clearing offering currently under development.
- On March 3, the FIA PTG Market Access Committee met virtually with Nasdaq to continue discussions of the ongoing data center equalization project.
- On March 10, FIA PTG members attending the FIA Boca Conference met with Cboe Head of US Options, Meghan Dugan, members of the FMX leadership team, Digital Asset Co-Founder and CEO, Yuval Rooz and Trabue Bland, ICE SVP Futures Exchanges and Elizabeth King, ICE Global Head of Clearing & Chief Regulatory Officer.
- On March 11, FIA PTG members attending the FIA Boca Conference met with Options Clearing Corporation (OCC) CEO, Andrej Bolkovic, and members of the OCC leadership team and CME Group Chairman & CEO, Terry Duffy, and members of the CME leadership team.

- On March 18, the FIA PTG 24H Trading Committee met virtually with representatives from Depository Trust & Clearing Corporation (DTCC). Topics discussed included: timeline for extended clearing hours; thoughts on start and end of trading day; handling of corporate actions and ongoing modernization plans for trade capture more broadly.
- On March 19, the FIA PTG Equity Market Structure Committee met virtually with Treasury, Office of Capital Markets. The focus of this introductory meeting was a discussion of our equity market structure priorities – CAT, Reg SHO, Trade-Through Prohibitions, Broker-Dealer net capital and the status of all of the proposed but not finalized rules. We agreed to meet on a biannual basis.
- On March 20, the FIA PTG 24H Trading Committee met virtually with Jon Herrick and Kevin Tyrrell from NYSE. Topics discussed included: timeline for extending trading hours to 22/5; thoughts on start and end of trading day; handling of corporate actions; and market maker obligations and incentives.
- On April 11, FIA and FIA PTG jointly responded to the International Organization of Securities Commissions (IOSCO) report entitled, “Artificial Intelligence in Capital Markets: Use Cases, Risks, and Challenges.” The [response](#) emphasized that any IOSCO recommendations addressing AI in capital markets, including futures and derivatives markets, needed to be carefully developed, coordinated and practical.
- On May 5, the recently formed FIA PTG 25G Working Group held separate meetings with MEMX and Cboe to hear about their plans for potentially upgrading their networks to 25G.
- On May 13, the FIA PTG Digital Assets Committee met with staff from the House Agriculture and Financial Services Committees to discuss the most recent draft of digital assets market structure legislation.
- On June 11, FIA PTG filed a [comment letter](#) with FINRA in response to FINRA Regulatory Notice 25-04 - FINRA Launches Broad Review to Modernize Rules Regarding Member Firms and Associated Persons. The letter, available [here](#), sets out fifteen areas of FINRA rulemakings with suggestions for “modernization.”
- On July 22, representatives of FIA PTG had in-person meetings with Brian Smith, Tyler Williams and others at U.S. Treasury. A variety of topics were discussed.
- On July 22, representatives of FIA PTG had in-person meetings with Republican staff from the House Financial Services Committee, Senate Agriculture Committee and Senate Banking Committee. A variety of topics were discussed.
- On July 29, members of the FIA PTG 24H Trading Committee met with ICE Futures U.S. President, Jennifer Ilkew. Topics discussed included the exchange's plans for 24/7 trading and tokenized collateral.
- On September 4, the FIA PTG 24H Committee and FIA PTG Event Contracts and Prediction Markets Working Group met with CME Group leadership. Topics discussed included plans/timelines for launching 24/7 trading, processing of trades, margins, etc., over the weekend, challenges of providing liquidity in binary options if they are classified as swaps, and plans for the CME FCM.

- On September 25, the FIA PTG Treasury Market Structure Committee met virtually with the ICE UST Clearing Team for an update on their efforts related to the Treasury Clearing Mandate.
- On October 23, representatives from PTG participated in meetings in DC. Meetings included staff and member offices from the Senate Agriculture and Banking Committees, House Financial Services Committee Subcommittee on Digital Assets staff, and staff from Senator Gillibrand's (D-NY) office.
- On November 3, PTG filed a [comment letter](#) in response to the FTC request for information regarding employer noncompete agreements.
- On December 8, representatives from the PTG Market Access Committee met virtually with CME Group leadership to discuss planned data center and cloud migrations.

PTG OUTREACH

Highlighted Media Outreach

- Hosted a media roundtable at the FIA Boca Conference where representatives from the FIA PTG Executive Committee met with reporters from Argus Media, Bloomberg News, Chicago Tribune, The Options Insider, Reuters News and Wall Street Journal.

Conferences

- Members moderated and/or participated in panels at FIA Boca, FIA Law & Compliance and the FIA Futures & Options Expo conference programs.

OTHER INITIATIVES

- On January 16, FIA and FIA PTG jointly hosted a Virtual Roundtable Discussion on Done-Away Cash Treasury Clearing. Over 70 participants from Inter-Dealer Brokers (IDBs), CCPs, Principal Trading Firms (PTFs) and Futures Commission Merchants (FCMs) participated in the discussion. Topics discussed included IDB credit controls, limit hubs, FICC trade flows, documentation and overall timeline/potential for an extension request.
- On May 28, the FIA PTG Cyber Working Group held a half-day roundtable. 16 FIA PTG members participated (in person and via Zoom) in this networking and information sharing exercise.
- On December 3, the PTG Cyber Working Group held a second half-day roundtable. Members participated in person and the discussion focused on managing cybersecurity and AI.

ORGANIZATIONAL EVENTS

- Elected Officers, Executive Committee and Nominating Committee Members.
- Hosted six virtual members meetings of the group.
- Hosted 11 virtual networking meetings for the group.

- Hosted four in-person social events – including an inaugural NY dinner.

ADVOCACY GOALS – 2026

1. Continue educating policymakers, including regulators, relevant legislators, and staff.
2. Continue pursuit of additional worthwhile representation opportunities on regulatory advisory committees, panels, and roundtables.
3. Continue to work with equity and futures exchanges on matters of importance to the group.
4. Continue to work with other like-minded trade associations and companies where appropriate on issues of mutual interest.
5. Continue to inform Members and Member offices of our positions on possible legislative initiatives, as well as actions by the regulatory agencies they oversee. Possible legislative initiatives could include:
 - a. Digital asset market structure legislation.
 - b. Legislation related to SEC regulatory proposals, including equity market structure, dealer registration, FINRA membership, Consolidated Audit Trail, and treasury mandatory clearing.
 - c. Financial transaction tax.
 - d. Legislation aimed at “excessive speculation” in derivatives markets.
 - e. Legislation related to artificial intelligence.
 - f. Legislation promoting cross-margining, portfolio margin, and risk-based margining across securities and derivatives markets, including for Treasuries and options.
 - g. Congressional oversight of prudential/bank capital proposals like Basel III that may indirectly affect market liquidity, clearing access, and the cost of market making.
 - h. Other relevant legislation to derivatives/securities regulation.
6. Continue pursuing specific regulatory initiatives including:
 - a. Monitor for rule proposals and oversight developments related to automated trading (CFTC, SEC, Federal Reserve Board, US Treasury, and Exchanges).
 - b. Engagement with regulators on the implementation of digital asset market structure legislation (CFTC, SEC, Federal Reserve Board, US Treasury, and Exchanges).
 - c. Monitor for rule proposals and/or regulatory sandboxes for novel market structures such as 24/7 trading, perpetual futures, tokenized securities, and disintermediation CME (CFTC, SEC).
 - d. Monitor developments in the use of crypto assets and tokenized real-world assets as collateral for cleared and uncleared derivatives and engage on related risk management standards (CFTC).
 - e. Monitor the implementation of the Treasury clearing mandate (SEC).
 - f. Engagement with regulators on rule proposals for introducing artificial latency mechanisms (CFTC, SEC, and Exchanges).
 - g. Engagement on the SEC’s equity market structure proposals (SEC).
 - h. Engagement regarding other SEC actions, including dealer registration (SEC).
 - i. Monitor CCP recovery and resolution developments – including variation margin gains haircutting, waterfall, default auctions, and other issues (CFTC, IOSCO).
 - j. Monitor developments in policies for cybersecurity risks (SEC, CFTC).

- k. Monitor for any developments on transaction tax (Administration) and carried interest (Treasury).
- l. Monitor for regulatory developments regarding artificial intelligence (CFTC, SEC, and Administration).

OUTREACH GOALS – 2026

1. Continue to use X and elink to advance PTG positions and advocacy goals.
2. Launch LinkedIn site.