

2015 Mid-Year Report

Achievements

- Collaboration with FIA on:
 - o **Test Orders**: Successfully persuaded CME to create test symbols to facilitate submission of test orders to the production matching engine 4
 - o Leap Second: Worked with FIA Market Technology Division to prepare and disseminate information on the 2015 leap second ◆
 - o Assessing the Risks of Algo Trading: Letter to Senior Supervisors Group
 - o Industry Best Practices: Contributed extensive work to industry thought leadership and best practices, including automated trading standards, risk management, and equity market structure reforms
- Expansion: Welcomed new FIA PTG members Citadel Securities and WH Trading ⁴
- Industry Collaboration: Consulted with SIFMA on SEC & FINRA rule proposals ⁴

Thought Leadership



Contributed to the Guide to the Development and Operation of Automated Trading Systems 4



Published position paper on simplifying equity market structure via Reg NMS reform 🍎



Coming Soon: Datadriven analysis of Treasury market events on Oct. 15 🗥

CFTC Advisory Committee Participation



Outreach



FEDERAL RESERVE BANK of NEW YORK















U.S. TREASURY



Comment Letters

- CFTC: Request for Interpretation of Floor Trader Swap Transactions ¹
- SEC: Letter in support of certain provisions of equity market structure petition filed by BATS Global Markets ⁴
- SEC: Comments to the SEC Equity Market Structure Advisory Committee on Trade-Through Rule ◆
- SEC: Comments on FINRA membership exemption for certain exchange members 4
- FINRA: Comment Letter on Registration of Associated Persons who Develop Algorithmic Trading Strategies ◆↑
- FINRA: Comment letter on Trading Activity
 Fee Proposal ⁴

Blogs

- Blog: Consensus on Equity Market Reform 🖰
- Blog: Crowdsourcing Excellence in Automated Trading 4
- Blog: Addressing Complexity from the Trade-Through Rule →

By the Numbers



Active Working Groups

- Equity Market Structure
- FIA Market Technology Standards Group
- CFTC Reauthorization
- Cybersecurity
- SMP Technology Standards
- New Member Recruiting
- FINRA Algo AP Registration Proposal
- FINRA TAF Exemption Proposal
- SEC FINRA Required Membership Proposal

2015 Advocacy Goals

- Continue to build relationship with new CFTC leadership
- Continue to expand relationships with the securities regulators, including SEC and FINRA
- Continue to develop group positions on equity market structure reform for dissemination to regulators, legislators, and the media
- Specific regulatory initiatives including:
 - o Rules related to disruptive trading practices (CFTC, Exchanges, and SEC)
 - Rules related to broker-dealer and FINRA registration requirements for proprietary trading firms (SEC)
 - o Rules related to central trading of futures including DCM Core Principle 9, futures block sizes, and EFRPs (CFTC)
 - o Wash sales rules (CFTC, SEC, and FINRA)
 - o New regulation and oversight of HFT and/or automated trading systems (CFTC and SEC)
- Fair access to centrally traded and cleared OTC markets