



## DAILY TRADE SUBMISSION: FREQUENTLY ASKED QUESTIONS

**New NFX Website:** <http://www.nasdaqomx.com/transactions/markets/nasdaq-futures>

### **1: What are Futures Participants and Clearing Futures Participants required to report on a daily basis?**

Pursuant to NFX Rules at Chapter III, Section 16, each Futures Participant is required to file any report, statement, form, or other information with the Commission pursuant to Parts 15, 17 or 18 of Commission Regulations. In addition, Futures Participants must file a copy of such report with the Exchange.

### **2: How do Futures Participants submit copies of Large Trader Reports to the Exchange?**

All large trader reports shall be submitted in a form acceptable to the Exchange, which may require that more than one large trader report be submitted daily. Clearing Futures Participants, omnibus accounts and foreign brokers must provide the Exchange with the required CFTC Form 102 ("Identification of Special Accounts") accurately identifying the owners, controllers, controlled accounts and any additional information required for each reportable account within three Business Days of the first day that the account in question becomes reportable. Notwithstanding the three Business Day requirement, on the first day that an account becomes reportable, Clearing Futures Participants, omnibus accounts and foreign brokers must, at the direction of the Exchange, submit the following information: account type, reportable account number and names and addresses of the owners and controllers of the account. Please note that the daily Large Trader Reporting submission to the Exchange must include for each reportable account the volume bought and sold in the reportable instrument, by Expiry. Any material changes to the information previously provided to the Exchange will require the submission of a revised form within three Business Days of such changes becoming effective. Additionally, in the absence of any material changes, the Exchange may require the submission of a new form on a biennial basis for the maintenance of accurate records.

### **3: Are the requirements different for omnibus accounts?**

No, omnibus accounts have the same reporting obligations. Failure by an omnibus account or foreign broker to submit required information may result in a disciplinary proceeding and result in limitations, conditions or denial of access of such omnibus account or foreign broker to any Exchange market. Notwithstanding the above, Clearing Futures Participants carrying such accounts remain responsible for obtaining and providing to the Exchange information regarding the ownership and control of positions in circumstances where an omnibus account or foreign broker has failed to provide the information to the Exchange.

#### **4: What is the obligation to report Open Interest?**

Pursuant to NFX Rules at Chapter III, Section 18, each Clearing Futures Participants is required to accurately report open interest via position offsets on a daily basis to The Options Clearing Corporation (“OCC”) in the form required by OCC and pursuant to OCC Rules.

#### **5: What is the format for Large Trader report submissions?**

The CFTC publishes the Large Trader regulations, which set standards for data submission and formats for Large Trader reporting. NFX requires that Large Trader report files be reported in the same format. Clearing Futures Participants and Futures Participants (FCMs) will need to report Large Trader data in the format defined by the CFTC's data specification. To view and for more information on the CFTC data specification visit:

<http://www.cftc.gov/IndustryOversight/MarketSurveillance/LargeTraderReportingProgram/ltrp>

#### **6: What will the format be for OCR submissions on September 30, 2015?**

The CFTC published the OCR Final Rule, which, among other things, set standards for data submission and format for OCR reports. NFX will require that the files be reported in this same format. FCMs are required to report forms 102A, 102B, and 71 in the xml format defined by the CFTC's data specification. To view and for more information on the CFTC data specification visit: <http://www.cftc.gov/Forms/OCR>

#### **7: How do I submit Large Trader and how will I submit OCR reports (after September 30, 2015) to the Exchange?**

Large Trader and OCR reports are submitted to the Exchange via SFTP. Please contact NFX Market Operations to establish connectivity to the SFTP server at [nfxops@nasdaq.com](mailto:nfxops@nasdaq.com).

#### **8: What are the deadlines to report the above information?**

INFX Large Trader Submission: 10:00 am ET

OCR (after September 30, 2015): Submission: 10:00 am ET

OCC Position Offset for Open Interest: Submission: 7:30 am ET

#### **9: Where can I find more information?**

<http://www.cftc.gov/IndustryOversight/MarketSurveillance/LargeTraderReportingProgram/ltrformat>

<http://www.cftc.gov/Forms/OCR/index.htm>

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