



July 3, 2019

Vanessa Countryman  
Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-1090

Re: Forty-Fourth Amendment to the UTP Plan

Dear Ms. Countryman:

Enclosed please find the above-captioned amendment to the Second Restatement of the UTP Plan (the "Plan") as approved and executed by the Plan Participants, Cboe BYX Exchange, Inc., Cboe BZX Exchange, Inc., Cboe EDGA Exchange, Inc., Cboe EDGX Exchange, Inc., Cboe Exchange, Inc., Chicago Stock Exchange, Inc., Financial Industry Regulatory Authority, Inc., Investors' Exchange LLC, Nasdaq BX, Inc., Nasdaq ISE, LLC, Nasdaq PHLX, Inc., The Nasdaq Stock Market LLC, New York Stock Exchange LLC, NYSE American LLC, NYSE Arca, Inc., and NYSE National, Inc. (collectively, the "Participants").

The Participants propose to make mandatory a conflicts of interest disclosure regime that is currently voluntary. Under the regime, the Participants, the Processors, the Administrators, and the members of the Advisory Committee (collectively, the "Disclosing Parties")<sup>1</sup> provide responses to a set of questions designed to provide transparency regarding potential conflicts of interest. Such responses will be made available to the public via the Plan's website. The Participants believe that publicly providing these responses will increase transparency and confidence in the governance of the Plan.

A. Rule 608(a)

1. Purpose of the Amendment

*Background*

With Exchanges permitted to offer both proprietary market data products and also acting as Participants in running the public market data stream, potential conflicts of interest are inherent

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<sup>1</sup> A list of the Processors, Administrators, and Advisory Committee members is available at <https://www.utpplan.com/governance>.

in the structure developed under Regulation NMS. There may be instances in which representatives from the Participants and Advisory Committee members have responsibilities with respect to both proprietary data and Securities Information Processor (“SIP”) data. Drawing on the expertise of persons with such overlapping responsibilities may give rise to potential conflicts of interest, and to address such potential conflicts of interest, the Participants adopted a voluntary conflicts disclosure regime.

After discussion among the Participants and the Advisory Committee at several meetings of the Plan’s Operating Committee, the Participants believe that a disclosure regime is a pragmatic step to address potential conflicts of interest.

As noted below, the Disclosing Parties have voluntarily provided responses to the disclosure regime questions. The responses are available on the Plans' website. The purpose of the amendment is to make the disclosures a requirement on a going forward basis instead of relying on voluntary disclosures.

#### *Required Disclosures*

As part of the disclosure regime, the Participants propose that the Participants, the Processors, the Administrators, and members of the Advisory Committee respond to questions that are tailored to elicit responses that disclose the potential conflicts of interest.

The Participants propose that the Participants respond to the following questions and instructions:

- Is the Participant's firm for profit or not-for-profit? If the Participant's firm is for profit, is it publicly or privately owned? If privately owned, list any owner with an interest of 5% or more of the Participant, where to the Participant’s knowledge, such owner, or any affiliate controlling, controlled by, or under common control with the owner, subscribes, directly or through a third-party vendor, to SIP and/or exchange Proprietary Market Data products.
- Does the Participant firm offer real-time proprietary equity market data that is filed with the SEC (“Proprietary Market Data”)? If yes, does the firm charge a fee for such offerings?
- Provide the names of the representative and any alternative representatives designated by the Participant who are authorized under the Plans to vote on behalf of the Participant. Also provide a narrative description of the representatives' roles within the Participant organization, including the title of each individual as well as any direct responsibilities related to the development, dissemination, sales, or marketing of the Participant's Proprietary Market Data, and the nature of those responsibilities.

The Participants propose that the Processors respond to the following questions and instructions:

- Is the Processor an affiliate of or affiliated with any Participant? If yes, disclose the Participant(s)?

- Provide a narrative description of the functions directly performed by the manager employed by the Processor to provide Processor services to the Plans and the staff that reports to that manager (collectively, the “Plan Processor”).
- Does the Plan Processor provide any services for any Participant's Proprietary Market Data products or other Plans? If Yes, disclose the services the Plan Processor performs and identify which Plans. Does the Plan Processor have any profit or loss responsibility for a Participant's Proprietary Market Data products?
- List the policies and procedures established to safeguard confidential Plan information that is applicable to the Plan Processor.

The Participants propose that the Administrators respond to the following questions and instructions:

- Is the Administrator an affiliate of or affiliated with any Participant? If yes, which Participant?
- Provide a narrative description of the functions directly performed by administrative services manager and the staff that reports to that manager (collectively, the “Plan Administrator”).
- Does the Plan Administrator provide any services for any Participant's Proprietary Market Data products? If yes, what services? Does the Plan Administrator have any profit or loss responsibility for a Participant's Proprietary Market Data products?
- List the policies and procedures established to safeguard confidential Plan information that is applicable to the Plan Administrator.

The Participants propose that the Members of the Advisory Committee respond to the following questions and instructions:

- Provide the Advisor's title and a brief description of the Advisor's role within the firm.
- Does the Advisor have responsibilities related to the firm’s use or procurement of market data?
- Does the Advisor have responsibilities related to the firm's trading or brokerage services?
- Does the Advisor's firm use the SIP? Does the Advisor's firm use exchange Proprietary Market Data products?
- Does the Advisor's firm have an ownership interest of 5% or more in one or more Participants? If yes, list the Participant(s).
- Does the Advisor actively participate in any litigation against the Plans?

The Participants will post the responses to these questions on the Plan’s website. If a Disclosing Party has any material changes in its responses, the Disclosing Party must promptly update its disclosures. Additionally, the Disclosing Parties will update the disclosures on an annual basis to reflect any changes. This annual update must be made before the first quarterly session meeting of each calendar year, which is generally held in mid-February.

2. Governing or Constituent Documents

Not applicable.

3. Implementation of Amendment

Each of the Participants has approved the amendments in accordance with Section IV.C of the UTP Plan. The Participants also received and incorporated feedback from the Advisory Committee in preparing the disclosure requirements.

4. Development and Implementation Phases

The Disclosing Parties have voluntarily completed, and the Participants have posted, responses to the questions outlined above on the Plan's website. The purpose of the amendment, going forward, is to make the disclosures a requirement rather than relying on voluntary disclosures.

5. Analysis of Impact on Competition

The Participants believe that the proposed amendments do not impose any burden on competition that is not necessary or appropriate in furtherance of the purposes of the Securities Exchange Act of 1934 (the "Act"). The Participants, together with the other Disclosing Parties, have determined to implement the disclosure regime described herein. The Participants believe that adopting this disclosure regime is an important step in addressing the potential conflicts of interest.

The disclosure regime should increase transparency in the governance of the public market data stream, and consequently, increase confidence in the proper functioning of the Operating Committee.

6. Written Understanding or Agreements relating to Interpretation of, or Participation in, Plan

Not applicable.

7. Approval by Sponsors in Accordance with Plan

Section IV.C.1 of the UTP Plan requires the Participants to unanimously approve the amendment proposed herein. They so approved it.

8. Description of Operation of Facility Contemplated by the Proposed Amendment

Not applicable.

9. Terms and Conditions of Access

Not applicable.

10. Method of Determination and Imposition, and Amount of, Fees and Charges

Not applicable.

11. Method and Frequency of Processor Evaluation

Not applicable.

12. Dispute Resolution

Not applicable.

B. Regulation NMS Rule 601(a)

1. Equity Securities for which Transaction Reports Shall be Required by the Plan

Not applicable.

2. Reporting Requirements

Not applicable.

3. Manner of Collecting, Processing, Sequencing, Making Available and Disseminating Last Sale Information

Not applicable.

4. Manner of Consolidation

Not applicable.

5. Standards and Methods Ensuring Promptness, Accuracy and Completeness of Transaction Reports

Not applicable.

6. Rules and Procedures Addressed to Fraudulent or Manipulative Dissemination

Not applicable.

7. Terms of Access to Transaction Reports

Not applicable.

8. Identification of Marketplace of Execution

Not applicable.

Sincerely yours,



Robert Books  
Chair, UTP Operating Committee

cc: UTP Plan Participants (w/o attachments)  
Plan Advisory Committee Members  
Michael Coe (SEC)

## AMENDMENT NO. 44

### JOINT SELF-REGULATORY ORGANIZATION PLAN GOVERNING THE COLLECTION, CONSOLIDATION AND DISSEMINATION OF QUOTATION AND TRANSACTION INFORMATION FOR NASDAQ-LISTED SECURITIES TRADED ON EXCHANGES ON AN UNLISTED TRADING PRIVILEGE BASIS

#### Disclosure of Potential Conflicts of Interest

AGREEMENT made as of the 14th day of June 2019, among Cboe BYX Exchange, Inc., Cboe BZX Exchange, Inc., Cboe EDGA Exchange, Inc., Cboe EDGX Exchange, Inc., Cboe Exchange, Inc., Chicago Stock Exchange, Inc., Financial Industry Regulatory Authority, Inc., Investors' Exchange LLC, Nasdaq BX, Inc., Nasdaq ISE, LLC, Nasdaq PHLX, Inc., The Nasdaq Stock Market LLC, New York Stock Exchange LLC, NYSE American LLC, NYSE Arca, Inc., and NYSE National, Inc. (collectively, the "Participants").

The Participants enter into this Agreement in order to make mandatory a disclosure regime of potential conflicts of interest which currently is voluntary.

For those purposes, the Participants agree that:

- (a) Section IV.F to be added and read as follows:

F. Disclosure of Potential Conflicts of Interests

- (a) Disclosure Requirements. The Participants, the Processor, the Plan Administrator, and members of the Advisory Committee (for purposes of this section, "Disclosing Parties") shall complete the applicable questionnaire attached to this UTP Plan as Exhibit 3.
- (b) Updates to Disclosures. Following a material change in the information disclosed pursuant to subparagraph (a), a Disclosing Party shall promptly update its disclosures. Additionally, a Disclosing Party shall update annually any inaccurate information prior to the Operating Committee's first quarterly meeting of a calendar year.
- (c) Public Dissemination of Disclosures. The Disclosing Parties shall provide the Administrator with its disclosures and any required updates. The Administrator shall ensure that the disclosures are promptly posted to the Plan's website.
- (b) The questionnaires, as set forth in Addendum 2 to this Agreement, shall be attached to the UTP Plan as Exhibit 3.

\* \* \* \* \*

Addendum 1 to this Agreement contains an additional version of Sections I(A) and VIII(C), marked to show the proposed changes set forth in this Agreement. In Addendum 1, proposed additions are double-underlined and proposed deletions are [~~struck through and bracketed~~.]

These amendments to the Plan will be effective upon approval by the Commission.

The Participants may execute this Agreement in counterparts, no one of which need contain all signatures of all executing parties. A set of those counterparts that contains all such signatures shall constitute one and the same instrument.

Except for the amendments contained in this amendment, the Plan is unchanged and remains in full force and effect.

CBOE BYX EXCHANGE, INC.

Dated: 6/25/2019

By [Signature]

CBOE BZX EXCHANGE, INC.

Dated: 6/25/2019

By [Signature]

CBOE EDGA EXCHANGE, INC.

Dated: 6/25/2019

By [Signature]

CBOE EDGX EXCHANGE, INC.

Dated: 6/25/2019

By [Signature]



CBOE EXCHANGE, INC.

Dated: 6/25/2019

By [Signature]

CHICAGO STOCK EXCHANGE, INC.

Dated: \_\_\_\_\_

By \_\_\_\_\_

FINANCIAL INDUSTRY REGULATORY  
AUTHORITY, INC.

Dated: \_\_\_\_\_

By \_\_\_\_\_

INVESTORS' EXCHANGE LLC

Dated: \_\_\_\_\_

By \_\_\_\_\_

NASDAQ BX, INC.

Dated: \_\_\_\_\_

By \_\_\_\_\_

NASDAQ ISE, LLC

Dated: \_\_\_\_\_

By \_\_\_\_\_

NASDAQ PHLX LLC

Dated: \_\_\_\_\_

By \_\_\_\_\_

CBOE EXCHANGE, INC.

Dated: \_\_\_\_\_

By \_\_\_\_\_

CHICAGO STOCK EXCHANGE, INC.

Dated: 6/24/2019

By 

FINANCIAL INDUSTRY REGULATORY  
AUTHORITY, INC.

Dated: \_\_\_\_\_

By \_\_\_\_\_

INVESTORS' EXCHANGE LLC

Dated: \_\_\_\_\_

By \_\_\_\_\_

NASDAQ BX, INC.

Dated: \_\_\_\_\_

By \_\_\_\_\_

NASDAQ ISE, LLC

Dated: \_\_\_\_\_

By \_\_\_\_\_

NASDAQ PHLX LLC

Dated: \_\_\_\_\_

By \_\_\_\_\_

CBOE EXCHANGE, INC.

Dated: \_\_\_\_\_

By \_\_\_\_\_

CHICAGO STOCK EXCHANGE, INC.

Dated: \_\_\_\_\_

By \_\_\_\_\_

FINANCIAL INDUSTRY REGULATORY  
AUTHORITY, INC.

Dated: 6/20/19

By Thom R. Lewis

INVESTORS' EXCHANGE LLC

Dated: \_\_\_\_\_

By \_\_\_\_\_

NASDAQ BX, INC.

Dated: \_\_\_\_\_

By \_\_\_\_\_

NASDAQ ISE, LLC

Dated: \_\_\_\_\_

By \_\_\_\_\_

NASDAQ PHLX LLC

Dated: \_\_\_\_\_

By \_\_\_\_\_

CBOE EXCHANGE, INC.

Dated: \_\_\_\_\_

By \_\_\_\_\_

CHICAGO STOCK EXCHANGE, INC.

Dated: \_\_\_\_\_

By \_\_\_\_\_

FINANCIAL INDUSTRY REGULATORY  
AUTHORITY, INC.

Dated: \_\_\_\_\_

By \_\_\_\_\_

INVESTORS' EXCHANGE LLC

Dated: 6-24-19

By  \_\_\_\_\_

NASDAQ BX, INC.

Dated: \_\_\_\_\_

By \_\_\_\_\_

NASDAQ ISE, LLC

Dated: \_\_\_\_\_

By \_\_\_\_\_

NASDAQ PHLX LLC

Dated: \_\_\_\_\_

By \_\_\_\_\_

CBOE EXCHANGE, INC.

Dated: \_\_\_\_\_

By \_\_\_\_\_

CHICAGO STOCK EXCHANGE, INC.

Dated: \_\_\_\_\_

By \_\_\_\_\_

FINANCIAL INDUSTRY REGULATORY  
AUTHORITY, INC.

Dated: \_\_\_\_\_

By \_\_\_\_\_

INVESTORS' EXCHANGE LLC

Dated: \_\_\_\_\_

By \_\_\_\_\_

NASDAQ BX, INC.

Dated: 6/24/2019

By  \_\_\_\_\_

NASDAQ ISE, LLC

Dated: 6/24/2019

By  \_\_\_\_\_

NASDAQ PHLX LLC

Dated: 6/24/2019

By  \_\_\_\_\_

NASDAQ STOCK MARKET LLC

Dated: 6/24/2019

By  \_\_\_\_\_

NEW YORK STOCK EXCHANGE LLC

Dated: \_\_\_\_\_

By \_\_\_\_\_

NYSE AMERICAN LLC

Dated: \_\_\_\_\_

By \_\_\_\_\_

NYSE ARCA, INC.

Dated: \_\_\_\_\_

By \_\_\_\_\_

NYSE NATIONAL, INC.

Dated: \_\_\_\_\_

By \_\_\_\_\_

NASDAQ STOCK MARKET LLC

Dated: \_\_\_\_\_

By \_\_\_\_\_

NEW YORK STOCK EXCHANGE LLC

Dated: 6/24/2019

By 

NYSE AMERICAN LLC

Dated: 6/24/2019

By 

NYSE ARCA, INC.

Dated: 6/24/2019

By 

NYSE NATIONAL, INC.

Dated: 6/24/2019

By 

## ADDENDUM 1

### To the Forty-Fourth Amendment to the Plan

#### PROPOSED AMENDMENTS TO THE UTP PLAN

MARKED TO SHOW CHANGES FROM THE EXISTING PLAN  
(Additions are double-underlined; Deletions are [~~struck through and bracketed~~].)

#### IV. Administration of Plan

A. – E. No change.

#### F. Disclosure of Potential Conflicts of Interests

- (a) Disclosure Requirements. The Participants, the Processor, the Plan Administrator, and members of the Advisory Committee (for purposes of this section, "Disclosing Parties") shall complete the applicable questionnaire attached to this UTP Plan as Exhibit 3.
- (b) Updates to Disclosures. Following a material change in the information disclosed pursuant to subparagraph (a), a Disclosing Party shall promptly update its disclosures. Additionally, a Disclosing Party shall update annually any inaccurate information prior to the Operating Committee's first quarterly meeting of a calendar year.
- (c) Public Dissemination of Disclosures. The Disclosing Parties shall provide the Administrator with its disclosures and any required updates. The Administrator shall ensure that the disclosures are promptly posted to the Plan's website.



# Addendum 2

# Processor Disclosure Form

The Processors of the Consolidated Tape Association (“CTA”) and Unlisted Trading Privileges (“UTP”) Plans are charged with collecting, processing and preparing for the distribution or publication of CTA and UTP Plan information. To enhance transparency in Plan operations, the Processors submit the following voluntary disclosures.

The Processors intend to update these disclosures annually, or whenever there is a material change to any disclosure, whichever is sooner.

Name of Processor		Date of Disclosure				
1	Is the Processor affiliated with any Participant?	If “Yes,” which Participant?				
		<input type="checkbox"/> Cboe BYX Exchange, Inc	<input type="checkbox"/> Cboe BZX Exchange, Inc.	<input type="checkbox"/> Cboe EDGA Exchange, Inc.	<input type="checkbox"/> Cboe EDGX Exchange, Inc.	
		<input type="checkbox"/> Cboe Exchange, Inc.	<input type="checkbox"/> Financial Industry Regulatory Authority, Inc.	<input type="checkbox"/> Investors' Exchange LLC	<input type="checkbox"/> Nasdaq BX, Inc.	
		<input type="checkbox"/> Nasdaq ISE, LLC	<input type="checkbox"/> Nasdaq PHLX LLC	<input type="checkbox"/> Nasdaq Stock Market LLC	<input type="checkbox"/> New York Stock Exchange LLC	
		<input type="checkbox"/> NYSE American LLC	<input type="checkbox"/> NYSE Arca, Inc.	<input type="checkbox"/> NYSE Chicago, Inc.	<input type="checkbox"/> NYSE National, Inc.	
No	Yes					
<input type="checkbox"/>	<input type="checkbox"/>					
2						
Please provide a narrative description of the functions directly performed by the manager employed by the Processor to provide Processor services to the Plan and the staff that reports to that manager (collectively, the “Plan Processor”)						
Description of functions						
3	Does the Plan Processor provide any service(s) for any Participant’s Proprietary Market Data products or other Plans?	If “Yes”:				
		What service(s) and which Plan(s)?			Any profit/loss responsibility for such Proprietary Market Data?	
		Name(s) of services and Plan(s)			No	Yes
No	Yes				No	Yes
<input type="checkbox"/>	<input type="checkbox"/>				<input type="checkbox"/>	<input type="checkbox"/>
4						
List the policies and procedures established to safeguard confidential Plan information that is applicable to Processor						
Policies and Procedures						

# Participant Disclosure Form

The Operating Committees of the Consolidated Tape Association (“CTA”) and Unlisted Trading Privileges (“UTP”) Plans, charged with overseeing the operations of the CTA and UTP Plans, are composed of the national securities associations and national securities exchanges that submit trades and quotes to the Plans, known as the Plan “Participants.”<sup>1</sup> The Participants work through designated representatives, or alternate representatives, who are authorized to act on the Participants’ behalf. To enhance transparency in Plan governance, the Participants submit the following voluntary disclosures.

The Participants intend to update these disclosures annually, or whenever there is a material change to any disclosure, whichever is sooner.

Participant Firm Name		Date of Disclosure		
1.a	Is the Participant’s firm for profit or not-for-profit?	If the Participant’s firm is for profit, is it publically or privately owned?		
	<p style="text-align: center;">Not for Profit</p> <input type="checkbox"/>	<p style="text-align: center;">For Profit</p> <input type="checkbox"/>	<p style="text-align: center;">Public</p> <input type="checkbox"/>	<p style="text-align: center;">Private</p> <input type="checkbox"/>
1.b	If privately owned, please list any owner with an interest of 5% or more of the Participant, where to the Participant’s knowledge, such owner, or any affiliate controlling, controlled by or under common control with the owner, subscribes, directly or through a third party vendor, to SIP and/or exchange Proprietary Market Data products.			
	List of Owners with an interest of 5% or more	Percentage interest		
2.	Does the Participant firm offer real-time proprietary equity market data that is filed with the SEC (“Proprietary Market Data”)?	If “Yes”, is there a charge for such Proprietary Market Data offerings?		
	<p style="text-align: center;">No</p> <input type="checkbox"/>	<p style="text-align: center;">Yes</p> <input type="checkbox"/>	<p style="text-align: center;">No</p> <input type="checkbox"/>	<p style="text-align: center;">Yes</p> <input type="checkbox"/>
3	Please provide the names of the representative and any alternate representatives designated by the Participant firm who are authorized under the Plans to vote for the Participant. Also provide a narrative description of the representatives’ roles within the Participant organization, including the title of each individual as well as any direct responsibilities related to the development, dissemination, sales or marketing of the Participant’s Proprietary Market Data, and the nature of those responsibilities.			
	Names of designated primary representative	Title	Description of role	
	Proprietary Market Data responsibility type		Nature of Proprietary Market Data responsibilities	
	<input type="checkbox"/> Development of Market Data and related policies <input type="checkbox"/> Dissemination of Market Data	<input type="checkbox"/> Sales <input type="checkbox"/> Marketing		

<sup>1</sup> The list of UTP Plan Participants can be found here (<http://www.utpplan.com/participants>), and the list of CTA Plan Participants can be found here (<https://www.ctaplan.com/index>).

Names of designated alternate representative	Title	Description of role
Proprietary Market Data responsibility type		Nature of Proprietary Market Data responsibilities
<input type="checkbox"/> Development of Market Data and related policies	<input type="checkbox"/> Sales	
<input type="checkbox"/> Dissemination of Market Data	<input type="checkbox"/> Marketing	

# Advisor Disclosure Form

The Operating Committees of the Consolidated Tape Association (“CTA”) and Unlisted Trading Privileges (“UTP”) Plans, charged with overseeing the Plans, are assisted by an Advisory Committee composed of individuals who represent particular types of financial services firms or actors in the securities market, or who were selected by Plan Participants<sup>1</sup> to be members of the Advisory Committee. To enhance transparency in Plan governance, the members of the advisory committee submit the following voluntary disclosures.

The Advisors intend to update these disclosures annually, or whenever there is a material change to any disclosure, whichever is sooner.

Advisor Name	Firm(s) associated with Advisor		Date of Disclosure
1.a	Advisor’s Title Title	A brief description of Advisor’s role within the firm Description of role within the firm	
1.b	Does the Advisor have responsibilities related to the use or procurement of market data?		Does the Advisor have responsibilities related to the firm’s trading or brokerage services?
	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/> Yes <input type="checkbox"/>
2	Does the Advisor’s firm use SIP and/or exchange Proprietary Market Data products?		
	No <input type="checkbox"/>		Yes <input type="checkbox"/>
3	Does the Advisor’s firm have a beneficial ownership interest of 5% or more in Participant(s)?	If “Yes”, list the Participant(s). This disclosure requirement shall not apply to short-term positions in publicly-traded stock	
	No <input type="checkbox"/>	Yes <input type="checkbox"/>	Name of Participant(s)

<sup>1</sup> “Participants” are the national securities associations and national securities exchanges that submit trades and quotes to the Plans and are members of the Plans’ Operating Committees.

4	Does the Advisor actively participate in any litigation against the SIP? (An Advisor “actively participates” in litigation if the Advisor plays a substantial, individual role in such litigation, such as counsel, expert witness, or consultant.)	
	No <input type="checkbox"/>	Yes <input type="checkbox"/>

# Administrator Disclosure Form

The Administrators of the Consolidated Tape Association (“CTA”) and Unlisted Trading Privileges (“UTP”) Plans are charged with administering the Plans, which includes, but is not limited to, data feed approval, customer communications, contract management, and related functions. To enhance transparency in Plan administration, the Administrators submit the following voluntary disclosures.

The Administrators intend to update these disclosures annually, or whenever there is a material change to any disclosure, whichever is sooner.

Name of Administrator			Date of Disclosure					
1	Is the Administrator affiliated with any Participant?		If “Yes,” which Participant?					
	No <input type="checkbox"/>	Yes <input type="checkbox"/>	<input type="checkbox"/> Cboe BYX Exchange, Inc	<input type="checkbox"/> Cboe BZX Exchange, Inc.	<input type="checkbox"/> Cboe EDGA Exchange, Inc.	<input type="checkbox"/> Cboe EDGX Exchange, Inc.		
			<input type="checkbox"/> Cboe Exchange, Inc.	<input type="checkbox"/> Financial Industry Regulatory Authority, Inc.	<input type="checkbox"/> Investors' Exchange LLC		<input type="checkbox"/> Nasdaq BX, Inc.	
			<input type="checkbox"/> Nasdaq ISE, LLC	<input type="checkbox"/> Nasdaq PHLX LLC	<input type="checkbox"/> Nasdaq Stock Market LLC	<input type="checkbox"/> New York Stock Exchange LLC		
			<input type="checkbox"/> NYSE American LLC	<input type="checkbox"/> NYSE Arca, Inc.	<input type="checkbox"/> NYSE Chicago, Inc.	<input type="checkbox"/> NYSE National, Inc.		
2	Please provide a narrative description of the functions directly performed by administrative services manager and the staff that reports to that manager (collectively, the “Plan Administrator”):							
Description of functions								
3	Does the Plan Administrator provide any service(s) for any Participant’s Proprietary Market Data products?		If “Yes”:			Any profit/loss responsibility for such Proprietary Market Data?		
	No <input type="checkbox"/>	Yes <input type="checkbox"/>	What service(s)?			No		
			Name and description of Service(s)			Yes		
					<input type="checkbox"/>			
4	List the policies and procedures established to safeguard confidential Plan information that is applicable to the Administrator							
Policies and Procedures								