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SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549
Form 19b-4

File No.* SR - 2020 - * 117
Amendment No. (req. for Amendments *) 1

Filing by Cboe Exchange, Inc.

Pursuant to Rule 19b-4 under the Securities Exchange Act of 1934

Initial *	Amendment *	Withdrawal	Section 19(b)(2) *	Section 19(b)(3)(A) *	Section 19(b)(3)(B) *
☐	☑	☐	☑	☐	☐

Pilot	Extension of Time Period for Commission Action *	Date Expires *
☐	☐	

Rule

19b-4(f)(1) 19b-4(f)(4)
19b-4(f)(2) 19b-4(f)(5)
19b-4(f)(3) 19b-4(f)(6)

Notice of proposed change pursuant to the Payment, Clearing, and Settlement Act of 2010

Section 806(e)(1) * ☐

Section 806(e)(2) * ☐

Security-Based Swap Submission pursuant to the Securities Exchange Act of 1934

Section 3C(b)(2) * ☐

Exhibit 2 Sent As Paper Document

Exhibit 3 Sent As Paper Document

Description

Provide a brief description of the action (limit 250 characters, required when Initial is checked *).

The Exchange proposes to amend certain Rules to accommodate the listing and trading of certain index options with an index multiplier of one.

Contact Information

Provide the name, telephone number, and e-mail address of the person on the staff of the self-regulatory organization prepared to respond to questions and comments on the action.

First Name * Laura Last Name * Dickman

Title * VP, Associate General Counsel

E-mail * [redacted]

Telephone * [redacted] Fax

Signature

Pursuant to the requirements of the Securities Exchange Act of 1934,

has duly caused this filing to be signed on its behalf by the undersigned thereunto duly authorized.

Date 03/30/2021

By Laura G. Dickman

(Name *)

(Title *)

VP, Associate General Counsel

[redacted]

NOTE: Clicking the button at right will digitally sign and lock this form. A digital signature is as legally binding as a physical signature, and once signed, this form cannot be changed.

Required fields are shown with yellow backgrounds and asterisks.

SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

For complete Form 19b-4 instructions please refer to the EFFS website.

Form 19b-4 Information * Add Remove View	The self-regulatory organization must provide all required information, presented in a clear and comprehensible manner, to enable the public to provide meaningful comment on the proposal and for the Commission to determine whether the proposal is consistent with the Act and applicable rules and regulations under the Act.
Exhibit 1 - Notice of Proposed Rule Change * Add Remove View	The Notice section of this Form 19b-4 must comply with the guidelines for publication in the Federal Register as well as any requirements for electronic filing as published by the Commission (if applicable). The Office of the Federal Register (OFR) offers guidance on Federal Register publication requirements in the Federal Register Document Drafting Handbook, October 1998 Revision. For example, all references to the federal securities laws must include the corresponding cite to the United States Code in a footnote. All references to SEC rules must include the corresponding cite to the Code of Federal Regulations in a footnote. All references to Securities Exchange Act Releases must include the release number, release date, Federal Register cite, Federal Register date, and corresponding file number (e.g., SR-[SRO] -xx-xx). A material failure to comply with these guidelines will result in the proposed rule change being deemed not properly filed. See also Rule 0-3 under the Act (17 CFR 240.0-3)
Exhibit 1A- Notice of Proposed Rule Change, Security-Based Swap Submission, or Advance Notice by Clearing Agencies * Add Remove View	The Notice section of this Form 19b-4 must comply with the guidelines for publication in the Federal Register as well as any requirements for electronic filing as published by the Commission (if applicable). The Office of the Federal Register (OFR) offers guidance on Federal Register publication requirements in the Federal Register Document Drafting Handbook, October 1998 Revision. For example, all references to the federal securities laws must include the corresponding cite to the United States Code in a footnote. All references to SEC rules must include the corresponding cite to the Code of Federal Regulations in a footnote. All references to Securities Exchange Act Releases must include the release number, release date, Federal Register cite, Federal Register date, and corresponding file number (e.g., SR-[SRO] -xx-xx). A material failure to comply with these guidelines will result in the proposed rule change, security-based swap submission, or advance notice being deemed not properly filed. See also Rule 0-3 under the Act (17 CFR 240.0-3)
Exhibit 2 - Notices, Written Comments, Transcripts, Other Communications Add Remove View Exhibit Sent As Paper Document ☐	Copies of notices, written comments, transcripts, other communications. If such documents cannot be filed electronically in accordance with Instruction F, they shall be filed in accordance with Instruction G.
Exhibit 3 - Form, Report, or Questionnaire Add Remove View Exhibit Sent As Paper Document ☐	Copies of any form, report, or questionnaire that the self-regulatory organization proposes to use to help implement or operate the proposed rule change, or that is referred to by the proposed rule change.
Exhibit 4 - Marked Copies Add Remove View	The full text shall be marked, in any convenient manner, to indicate additions to and deletions from the immediately preceding filing. The purpose of Exhibit 4 is to permit the staff to identify immediately the changes made from the text of the rule with which it has been working.
Exhibit 5 - Proposed Rule Text Add Remove View	The self-regulatory organization may choose to attach as Exhibit 5 proposed changes to rule text in place of providing it in Item I and which may otherwise be more easily readable if provided separately from Form 19b-4. Exhibit 5 shall be considered part of the proposed rule change.
Partial Amendment Add Remove View	If the self-regulatory organization is amending only part of the text of a lengthy proposed rule change, it may, with the Commission's permission, file only those portions of the text of the proposed rule change in which changes are being made if the filing (i.e. partial amendment) is clearly understandable on its face. Such partial amendment shall be clearly identified and marked to show deletions and additions.

Item 1. Text of the Proposed Rule Change

(a) Cboe Exchange, Inc. (the "Exchange" or "Cboe Options") proposes to amend certain Rules to accommodate the listing and trading of certain index options with an index multiplier of one. The Exchange initially submitted this rule filing SR-CBOE-2020-117 to the Securities and Exchange Commission ("Commission") on December 23, 2020 (the "Initial Rule Filing"). This Amendment No. 1 supersedes the Initial Rule Filing and replaces it in its entirety. This Amendment No. 1 narrows the scope of the proposed rule change from all index options to broad-based index options that have index values of at least 100 and to non-flexible ("FLEX") options, as well provides additional support for the proposed rule change, but makes no other substantive changes to the proposal. The text of the proposed rule change is provided in Exhibit 5.

(b) Not applicable.

(c) Not applicable.

Item 2. Procedures of the Self-Regulatory Organization

(a) The Exchange's President (or designee) pursuant to delegated authority approved the proposed rule change on December 7, 2020, and Amendment No. 1 to the Initial Rule Filing on March 22, 2021.

(b) Please refer questions and comments on the proposed rule change to Pat Sexton, Executive Vice President, General Counsel, and Corporate Secretary, (312) 786-7467, or Laura G. Dickman (312) 786-7572, Cboe Exchange, Inc., 400 South LaSalle, Chicago, Illinois 60605.

Item 3. Self-Regulatory Organization's Statement of the Purpose of, and Statutory Basis for, the Proposed Rule Change

(a) Purpose

The purpose of this proposed rule change is to amend certain rules to accommodate the listing and trading of broad-based index options that have an index value of at least 100 with an index multiplier of one ("micro-options").[1] The Exchange may list options on broad-based indexes that satisfy the initial and maintenance criteria in Rule 4.10, and currently lists options on 12 broad-based indexes with an underlying index value of at least 100. The following table lists the broad-based indexes that have an index value of at least 100 on which the Exchange currently lists options, as well as the current value of the index as of the close of trading on March 30, 2021[2]:

Index (Option Symbol)	Current Value
S&P 500 Index (SPX)	3,958.55
Mini-S&P 500 Index (XSP)	395.86
Russell 2000 Index (RUT)	2,195.80
Mini-Russell 200 Index (MRUT)	219.58
Dow Jones Industrial Average (DJX)	330.67[3]
S&P 100 Index (OEX and XEO)	1,792.63
S&P 500 ESG Index (SPESG)	336.30

1 The Exchange intends to file a Form 19b-4(e) with the Commission for any index option it lists for trading with an index multiplier of one pursuant to Rule 19b-4(e) of the Act.

2 The Exchange intends to initially list micro-options on only a single index and may expand the listing of micro-options in the future in response to customer demand for such additional products.

3 Options are based on 1/100th of the full value of the Dow Jones Industrial Average ("DJIA").

MSCI EAFE Index (MXEA)	2,216.07
MSCI Emerging Markets Index (MXEF)	1,319.50
Russell 1000 Growth Index (RLG)	2,412.94
Russell 1000 Value Index (RLV)	1,500.12
Russell 1000 Index (RUI)	2,228.28

Pursuant to the definition of index multiplier[4] in Rule 4.11, the Exchange may determine the index multiplier of an option, which it generally does in the specifications for an index option.[5] Similarly, Article I, Section 1, I(3) of the Options Clearing Corporation ("OCC") By-Laws defines "index multiplier" as the dollar amount (as specified by the Exchange on which such contract is traded) by which the current index value is to be multiplied to obtain the aggregate current index value. Unlike the definition of a unit of trading for stock options in the OCC By-Laws, which states the unit of trading in is designated by OCC but is 100 shares if not otherwise specified, the definition of index multiplier includes no such default.[6] Therefore, the Exchange believes the current index multiplier definition in the OCC By-Laws (which would have previously been filed with the Commission) permits any index multiplier specified by the listing Exchange given the lack of a default index multiplier for index options (and the

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4 Rule 4.11 defines the term "index multiplier" as the amount specified in the contract by which the current index value is to be multiplied to arrive at the value required to be delivered to the holder of a call or by the holder of a put upon valid exercise of the contract. The Exchange included the proposed index multiplier in rule filings for certain products.

5 Option specifications are available on the Exchange's public website, *available at* cboe.com/tradable_products/. Currently, the Exchange has designated an index multiplier of 100 for indexes it currently lists for trading.

6 See OCC Bylaws Article I, Section 1, U(5)

inclusion of a default unit of trading for equity options). This is consistent with the lack of default number in Exchange's definition of index multiplier and the ability for the Exchange to specify the index multiplier, as noted above. However, certain other Rules reflect an index multiplier of 100, and the proposed rule change updates those Rules to reflect the potential for an index multiplier of one.

Additionally, the Exchange believes micro-options are covered by the disclosures in the Options Disclosure Document ("ODD"). The ODD reflects the possibility of differing values of index multipliers when describing features of index options.[7] Specifically, the ODD states the total exercise price for an index option is the exercise price multiplied by the multiplier, and the aggregate premium is the premium multiplied by the multiplier.[8] As a result, the risk disclosures regarding index options in the ODD currently cover any risks associated with option index options with multipliers of one (and other amounts).

Currently, the Exchange has designated an index multiplier of 100 for all index options it lists for trading. The proposed rule change amends various rules regarding index options to permit the Exchange to designate an index multiplier of one for broad-based indexes that (that have an index value of at least 100) on which it may list options.

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[7] The ODD is available at https://www.theocc.com/about/publications/character-risks.jsp. The ODD states that the exercise price of a stock option is multiplied by the number of shares underlying the option to determine the aggregate exercise price and aggregate premium of that option. See ODD at 18. Similarly, the ODD states that the total exercise price for an index option is the exercise price multiplied by the multiplier, and the aggregate premium is the premium multiplied by the multiplier. See ODD at 8, 9, and 125.

[8] See ODD at 8, 9, and 125.

Micro-options will trade in the same manner as index options.[9] The table below demonstrates the differences between a micro-option and a standard index option on, for example, the SPX Index:

Term	**Standard (Index Multiplier of 100)**	**Micro (Index Multiplier of 1)**
Strike Price	3930	3930
Bid or offer	32.05	32.05
Total Value of Deliverable	$393,000	$3,930
Total Value of Contract	$3,205	$32.05

To the extent the Exchange lists a micro-option on an index on which it also lists a standard index option, it will be listed with a different trading symbol than the standard index option with the same underlying index to reduce any potential confusion.[10] The Exchange believes that the clarity of this approach is appropriate and transparent. The Exchange recognizes the need to differentiate micro-option contracts from standard option contracts and believes the proposed rule change will provide the necessary differentiation.

The Exchange believes micro-options will expand investors' choices and flexibility by listing and trading option contracts on index options, which provide investors with the ability to gain exposure to the market, with a notional value of 1/100th of the value of current index options. The Exchange believes lower-valued micro-options may appeal to retail investors who currently may not participate in the trading of index

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9 The proposed rule change defines "micro-options" in Rule 4.11 as a broad-based index option for which the value of the underlying index is at least 100 with an index multiplier of one. The proposed rule change adds that references to "index option" in the Rules include "micro-option" unless the context otherwise requires.

10 For example, a standard index option for index ABC with an index multiplier of 100 may have symbol ABC, while a micro-option for index ABC with a multiplier of one may have symbol ABC9.

options, because index options are generally higher-priced securities due to the high levels of the indexes.[11] In other words, the Exchange believes micro-options could provide retail investors with a point of entry into the index options market, which will make options overlying larger-valued broad-based indexes more readily available as investing and hedging tools at more affordable and realistic prices, which would ultimately reduce investment risk. For example, with SPX at a value of 3906.71 on February 19, 2021, the notional value of an SPX option with an index multiplier of 100 was $390,671. Suppose on that date, a March SPX 3930 call was traded at $32.05, the cost of that option would have been $3,205 given the index multiplier of 100. Proportionately equivalent SPX micro-options would have provided investors with the ability to trade at the much lower price of $32.05 per contract.

To demonstrate the benefits of an index option with a smaller multiplier for a retail investor, consider a retail investor with $5,000 in her account. She makes options trades on average twice a month to add protection to her portfolio (equaling 24 options traders per year). Suppose SPESG has an index value of 400, and a 400 strike call with one day to expiration is priced at $1.75. With a 100 multiplier, one contract for this call option would cost $175. If this investor made this trade 24 times during a one year period, that would be a total cost of $4,200 ($175 x 24), which represents 84% of her total account value of $5,000. With a one multiplier contract, one contract for this call option would cost $1.75, for a total of $42 during a one-year period (assuming 24 trades), which represents only 0.84% of the total value of her account. Therefore, micro-options

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[11] The proposed rule change will not permit FLEX Options to have a one multiplier. The Exchange intends to submit a separate proposal to permit FLEX Options to have a one multiplier.

could provide this retail investor with a far more cost-effective way to trade index options.

The Exchange also believes limiting the filing to broad-based index options is reasonable, as broad-based index options will provide retail investors with access to products they can use to gain efficient exposure to the U.S. equity market and execute risk management and hedging strategies for their entire portfolio in a more economical manner (rather than trying to hedge positions for each security). For example, if a retail investor has positions in 20 different stocks, rather than protect against downside moves by buying options for each underlying stock (i.e., 20 options), the investor could instead buy a single put for a broad-based index option and cover the risk of that entire portfolio with a single option for which the maximum loss is known (i.e., the price of the premium paid for the option).[12] In other words, index options can provide retail investors with a risk management tool to hedge against a downturn in the U.S. equities market while they retain positions in securities the prices of which the investors believe may continue to rise.[13]

Additionally, exposure to broad-based index options may be less risky for short-term investments (which are common among retail investors) than exposure to single-stock options. Broad-based indexes generally have much lower long-term realized and

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[12] An investor's purchase of multiple options (compared to the purchase of a single option) could significantly increase the execution cost, risk, and complexity associated with trying to create a hedge on the investor's portfolio. If an investor was able to instead purchase an affordable single option to create a hedge, it would reduce the execution burden on the investor.

[13] The Exchange also believes it is reasonable to limit micro-options to broad-based indexes with values of at least 100, as indexes with smaller values would have smaller notional values and thus create less of a barrier to entry for retail investors. Therefore, the Exchange believes demand for a smaller multiplier for smaller-valued indexes would be minimal at this time.

implied volatility (and thus less risk) compared to equities. This lower volatility combined with the breadth and depth of the market liquidity generally makes options on broad-based indexes less risky than equity options, for which the volatility and risk can be 10 to 30 times greater than broad-based index options. As noted above, the one multiplier reduces the premium level for index options. Currently, in order for a retail investor to trade at a $5 to $10 premium level, which is consistent with a smaller $1,000 to $5,000 account's trading size, that investor would need to invest in extremely far out-of-the-money index options. More commonly, retail investors instead are forced to trade options on low-priced single-stock equity options. By offering a $5 to $10 price point for broad-based index options, micro-options will provide retail investors with a less risky hedging vehicle. The Exchange believes a lower premium micro-option will provide retail investors with a more compelling alternative to purchases of ETFs (or options on ETFs) for investors seeking exposure to broad market moves. For example, a $3 XSP call option can lose only the $3 premium spent, whereas a long position a SPY option can lose a significantly higher premium. On average, more than 100,000 one lot SPY options with an expiration of fewer than seven days trades daily. Recently, the average premium of these options was approximately $165, which would be the maximum loss for investors that purchase any such options. The Exchange believes, based on this information, there are market participants that would prefer a lower premium level to achieve this market exposure that micro-options can provide. In other words, a one multiplier is a simpler way to "fractionate" options (i.e., buy an index option with a smaller value rather than buy a portion of an index option with a 100 multiplier to achieve the same result) liquidity to provide access to smaller accounts (as opposed to,

for example, fractional options) and reduce the price access point of index options. Therefore, the Exchange believes micro-options listed on broad-based indexes, which are expected to have significantly smaller premiums than current options on those indexes, will provide retail investors with an attractive investment alternative to the products currently available in the market that have similar price points (such higher volatility single stocks and derivatives on those stocks).

Trading Hours

Micro-options will be available for trading during the same hours as standard index options pursuant to Rule 5.1(b)(2). Therefore, Regular Trading Hours for micro-options will generally be 9:30 a.m. to 4:15 p.m. Eastern time.[14] To the extent an index option is authorized for trading during Global Trading Hours, the Exchange may also list micro-options during that trading session as well, the hours for which trading session are 3:00 a.m. to 9:15 a.m. Eastern time.

Expiration, Settlement, and Exercise Style

The Exchange may list a micro-option on an index with the same expirations, settlements, and exercise styles as the standard index option overlying the same index. Consistent with existing rules for index options, the Exchange will generally allow up to six standard monthly expirations for micro-options[15] as well as up to 10 expiration months for LEAPS.[16] For certain specified index options (including EAFE, EM, and SPESG options) and any class that the Exchange (as the Reporting Authority) uses to

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14 Certain indexes close trading at 4:00 p.m. Eastern time. See Rule 5.1.

15 See Rule 4.13(a)(2).

16 See Rule 4.13(b). Index LEAPS may expire 12 to 180 months from the date of issuance.

calculate a volatility index (currently, only SPX options are used by the Exchange to calculate a volatility index), the Exchange may list up to 12 standard monthly expirations for micro-options on those indexes.[17] The Exchange may also list up to the same maximum number of expirations permitted in Rule 4.13(a)(2) for micro-options on broad-based index options with nonstandard expirations in accordance with the Nonstandard Expirations Pilot Program (as further discussed below).[18] Micro-options on broad-based indexes will be cash-settled contracts with European-style exercise in accordance with the listing criteria for those options.[19] Micro-options, like standard index options, with third-Friday expiration will also be A.M.-settled or P.M.-settled, as applicable, in accordance with the applicable listing criteria.[20]

As it does for certain standard index options, the Exchange may list micro-options over the same indexes with P.M.-settlement in certain instances (in addition to A.M.-settlement in accordance with the generic listing terms). Specifically, pursuant to Rule 4.13(c), the Exchange may open for trading Quarterly Index Expirations ("QIXs") on certain specified index options. QIXs are index option contracts that expire on the last business day of a calendar quarter, and the Exchange may list up to eight near-term quarterly expirations for trading.[21] Currently, the index multiplier for QIXs may be 100 or 500. The proposed rule change amends Rule 4.13(c) to permit the index multiplier to also be one to accommodate the listing of QIX micro-options on the specified indexes.

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17 See Rule 4.13(a).

18 See Rule 4.13(e).

19 See Rule 4.10(f) (broad-based initial listing criteria) and (h) (EAFE and EM); see also Rule 4.13(a)(3).

20 See id.

21 See Rule 4.13(c).

In addition, the Exchange's Nonstandard Expirations Pilot Program currently allows it to list Weekly and End of Month ("EOM") Expirations on any broad-based index.[22] Weekly and EOM options are P.M.-settled and may expire on any Monday, Wednesday, or Friday (other than the third Friday of the month or days that coincide with an EOM expiration) or on the last trading day of the month. Like standard index options with Weekly and EOM Expirations, micro-options on broad-based indexes with Weekly and EOM Expirations will be P.M.-settled and otherwise treated the same as options on the same underlying index that expire on the third Friday of the month. The maximum number of expirations that may be listed for each of Weeklys and EOMs in a micro-option is the same as the maximum number of expirations permitted in Rule 4.13(a)(2) (as described above) for micro-options on the same broad-based index.[23] The Exchange may currently list Weekly and EOM Expirations on broad-based indexes as a pilot, which pilot period currently expires on May 3, 2021. The Exchange currently submits regular reports and data to the Commission regarding the Nonstandard Expirations Pilot Program. To the extent the Exchange lists any micro-options with Weekly or EOM Expirations pursuant to this pilot program, the Exchange will include the same information with respect to micro-options that it does for standard options in the reports it submits to the Commission in accordance with the pilot program.

Similarly, the Exchange also currently has in place a pilot program under Rule 4.13, Interpretation and Policy .13 that allows the Exchange to list options on specified indexes that expire on the third Friday of the month that are P.M.-settled. The Exchange, therefore, may list micro-options on those same indexes pursuant to this pilot program,

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22 See Rule 4.13(e).

23 See id.

which pilot period currently expires on May 3, 2021 as well. As it will for the Nonstandard Expirations Pilot Program, to the extent the Exchange lists micro-options on the specified indexes pursuant to this P.M.-settlement pilot program, the Exchange will include the same information with respect to micro-options that it does for standard options in the reports it submits to the Commission in accordance with the pilot program.

Each micro-option will be on an index that already satisfies initial and maintenance listing criteria in Rule 4.10, and thus the underlying index of each micro-option consists of the same components as the underlying index of each standard index option. A micro-option will merely have 1/100th the value of a standard option overlying the same index. Because micro-options and standard index options may overlie the same indexes, market participants may use micro-options as a hedging vehicle to meet their investment needs in connection with index-related products and cash positions in a similar manner as they do with standard index options, but as a more manageably sized contract. The smaller-sized contract will also provide market participants with more precision to hedge their portfolios. Additionally, the smaller size makes a micro-option a lower cost option than a standard index option, making it a more affordable and lower risk investment choice for investors, particularly retail investors. Therefore, the Exchange believes it is appropriate to be able to list the same expirations and settlements for micro-options as it may for standard index options.[24]

Exercise Prices

The Exchange proposes to adopt Rule 4.13, Interpretation and Policy .01(l) to provide that, notwithstanding any other provision regarding strike price intervals in Rule

[24] Initially, the Exchange anticipates listing series that it expects would appeal to retail investors – specifically, short-dated expirations.

4.13, Interpretation and Policy .01, the interval between strike prices of series of micro-options will be $0.50 or greater. Because of the smaller contract size of micro-options, the Exchange believes it is appropriate to be able to list micro-options with smaller strike price intervals than standard index options.[25] The Exchange believes finer strike intervals will more closely align micro-options with their purpose of being a lower-cost investment tool to investors.[26] The Exchange believes that smaller strike intervals for micro-options will provide market participants with more efficient hedging and trading opportunities. The proposed $0.50 strike setting regime would permit strikes on a more refined scale, which the Exchange believes will allow investors, particularly retail investors, to more affordably and efficiently gain exposure to equity markets, hedge their positions in instrument and cash positions in their portfolios, and more precisely tailor their investment strategies.

As demonstrated above, there are two important distinctions between micro-options and standard options due to the difference in multipliers, one of which is how the total deliverable value is calculated (the other is the meaning of bids and offers, as further discussed below). Proposed Rule 4.13, Interpretation and Policy .01(l) describes the difference between the meaning of the exercise price of micro-option and a standard index option. Specifically, the proposed rule change states that strike prices for micro-options are set at the same level as index options with an index multiplier of 100. For

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[25] Pursuant to Rule 4.13, Interpretation and Policy .01, the interval between strike prices of standard index options is generally $5.00 except for lower-priced strikes, for which the smallest interval is $2.50, subject to certain exceptions (including reduced-value index options, which may have strike intervals of no less than $0.50 or $1).

[26] This is consistent with lower permissible strike intervals for certain reduced-value index options, which have the same practical effect as index options with a smaller multiplier. See id.

example, a micro-option call series with a strike price of 3250 has a total deliverable value of $3,250 (3250 x $1), while a standard option call series with a strike price of 3250 has a total deliverable value of $325,000 (3250 x $100).[27]

Minimum Increments

The Exchange proposes to amend Rule 5.4 to provide that a micro-option will have the same minimum increment for bids and offers as the minimum increment for a standard index option on the same index.[28] Similar to the proposed rule change above to describe the difference between the meaning of strike prices of micro-options and standard index options, the proposed rule change amends the Rules to describe the difference between the meaning of bids and offers for micro-options and standard index options. Specifically, proposed Rule 5.3(c)(2) provides that notwithstanding Rule 5.3(a),[29] bids and offers for a micro-option must be expressed in terms of dollars per

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[27] This corresponds to the calculation of exercise prices for other types of options with a reduced multiplier. For example, Rule 4.5, Interpretation and Policy .18(b) provides that strike prices for mini-options (which have multipliers of 10 rather than 100, as set forth in Rule 4.5, Interpretation and Policy .18(a)) are set at the same level as for standard options. For example, a call series strike price to deliver 10 shares of stock at $125 per share has a total deliverable value of $1,250 (10 x 125) if the strike is 125, while a call series strike price to deliver 100 shares of stock at $125 per share has a total deliverable value of $12,500 (100 x 125).

[28] See Rule 5.4(a). This corresponds to the provision regarding the minimum increment for mini-options.

[29] Rule 5.3(a) states that except as otherwise provided in Rule 5.3, must be expressed in terms of dollar and decimals per unit of the underlying security or index. The Exchange believes that the proposed rule change is consistent with this provision, as a bid of 7 will represent a bid of 7 for an option contract having an index multiplier (*i.e.*, unit of trading) of one. However, the Exchange proposes to add a specific provision regarding the meaning of bids and offers for micro-options to provide complete clarity in the Rules, and to maintain consistency in the Rules, which currently contain a separate provision for mini-options, which as discussed above, have a reduced multiplier compared to standard options as micro-options do.

1/100th part of the total value of the contract. For example, an offer of "0.50" represents an offer of $0.50 for a micro-option.[30]

Appointment Weights

The Exchange proposes to add micro-options each as a Tier AA class with a Market-Maker appointment weight of .001.[31] This is the same appointment weight as a majority of the other Tier AA options classes. The Exchange determines appointment weights of Tier AA classes based on several factors, including, but not limited to, competitive forces and trading volume. The Exchange believes the proposed initial appointment weight of .001 for each micro-option will foster competition by incentivizing Market-Makers to obtain an appointment in these newly listed options and provide increased liquidity in a newly listed class, to the benefit of all investors.

Contract Size Limits

The proposed rule change updates various other provisions in the following Rules to reflect that one-hundred micro-contracts overlying an index will be economically equivalent to one contract for a standard index option overlying the same index:

- Rules 1.1 (definition of "complex order") and 5.65(d) (definition of "complex trade"): The definition of "complex order" in Rule 1.1 provides, among other things that for purposes of Rules 5.33 and 5.85(b)(1), the term "complex order" means a complex order with any ratio equal to or greater than one-to-three

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30 An offer of "0.50" represents an offer of $50 for a standard index option with an index multiplier of 100.

31 See Rule 5.50(g). While the appointment weights of Tier AA classes are not subject to quarterly rebalancing under Rule 5.50(g)(1), the Exchange regularly reviews the appointment weights of Tier AA classes to ensure that they continue to be appropriate. The Exchange determines appointment weights of Tier AA classes based on several factors, including, but not limited to, competitive forces and trading volume.

(.333) and less than or equal to three-to-one (3.00), an Index Combo order, a stock-option order, or a security future-option order.[32] Similarly, in Rule 5.65(d), the definition of "complex trade" (for purposes of the options linkage plan) means the execution of an order in an option series in conjunction with the execution of one or more related order(s) in different option series in the same underlying security occurring at or near the same time in a ratio that is equal to or greater than one-to- three (.333) and less than or equal to three-to-one (3.0) and for the purpose of executing a particular investment strategy (for the purpose of applying the aforementioned ratios to complex trades comprised of both mini-option contracts and standard option contracts, ten (10) mini-option contracts will represent one (1) standard option contract. The proposed rule change adds to the definition in each of Rules 1.1 and 5.65(d) that for the purposes of applying these ratios to complex orders comprised of legs for both micro-options and standard options, 100 micro-option contracts represent one standard option contract.[33]

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32 The proposed rule change also conforms the definition of "complex order" in Rule 1.1 to the definition of "complex trade" in Rule 5.65 to say that it may be comprised of different series in the same "underlying security" rather than the same "class." As discussed above, micro-options will be a different class than standard index options overlying the same index. This accommodates, for example, the fact that a complex order could be comprised of mini-options and standard options overlying the same stock (as contemplated by the current definition) despite being in different classes. The proposed rule change also expands the definitions of complex order in Rule 1.1 and complex trade in Rule 5.65 to provide that it may similarly be comprised of different series in the same "underlying index." The Exchange notes that full-value indexes and reduced-value indexes are separate indexes under the Exchange Rules, so to the extent a multi-legged order whose legs overly different indexes (such as one leg with a full-value index and one leg with a reduced-value index) would not qualify for the definition of "complex trade."

33 This corresponds to the provision in those definitions regarding mini-options, which states that for the purpose of applying these ratios to complex orders

While retail investors generally do not submit highly complicated complex orders with many legs, certain simple complex orders, such as straddles, are common among retail investors. These strategies can provide retail investors with additional certainty with respect to the outcomes of their options investments and hedging opportunities. For example, consider an investor looking to hedge an upward move in the U.S. equities market, and assume the level of SPESG is 400. Rather than purchase a call with a 400 strike and expiration in one day at $1.75, he could enter into a call spread to buy a call with a 400 strike (with a $1.75 premium) and sell a call with a 403 strike (with a $0.75 premium), each with an expiration in one day, for a total cost of $1. While this simple strategy caps the potential payout of the investment to $3 (the difference between the strikes), it also reduces the total premium by approximately 43% ($1 compared to $1.75) and caps the maximum loss to the $1 investment.

Suppose instead this investor sought to hedge a market move but was unsure of in which direction it would move. This investor could invest in a straddle, purchase one call with a 400 strike (for $1.75) and one put with a 400 strike (for $1.75) for a total premium of $3.50. If the market moves by more than 3.50 in either direction (which would be a move of less than 1%), this investment will give the investor a positive return, with a maximum loss of $3.50. Currently, for an investor to invest in a similar strategy, the cost (and maximum loss) would be $350 rather than $3.50, a much more significant portion of a retail investor's account.

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comprised of legs for both mini-options and standard options, ten mini-option contracts represent one standard option contract.

- Rules 5.37 and 5.38: Rules 5.37 and 5.38 describe the Exchange's Automated Improvement Mechanism for simple ("AIM") and complex orders ("C-AIM"), respectively. There is no minimum size for an order submitted into an AIM or C-AIM Auction.[34] However, in an AIM Auction for orders less than 50 standard option contracts (or 500 mini-option contracts), the stop price must be at least one minimum increment better than the then-current national best-bid or offer or the order's limit price (if the order is a limit price), whichever is better. For orders of 50 standard option contracts (or 500 mini-option contracts) or more, the stop price must be at or better than the then-current national best-bid or offer or the order's limit price (if the order is a limit price), whichever is better.[35] The proposed rule change adds to Rule 5.37(b) that 5,000 micro-option contracts is the corresponding size for these stop price restrictions. Additionally, Rule 5.37(c) and 5.38(c) provide that no concurrent AIM or C-AIM Auctions, respectively, are permitted for orders less than 50 standard option contracts (or 500 mini-option contracts) (for C-AIM Auctions, the size is determined by the smallest leg of the complex order), but are permitted for orders of 50 standard option contracts (or 500 mini-option contracts) or greater (for C-AIM Auctions, the size is determined by the smallest leg of the complex order). The proposed rule change adds that 5,000 micro-option contracts is the corresponding size for determining whether concurrent auctions are permissible.

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34 The Exchange notes in SPX during Regular Trading Hours, there is a maximum size of 10 contracts for order submitted into AIM and C-AIM Auctions (in C-AIM, the maximum size is based on the smallest leg of the complex order).

35 See Rules 5.37(b).

- Rules 5.39 and 5.40: Rules 5.39 and 5.40 describe the Exchange's Solicitation Auction Mechanism for simple ("SAM") and complex ("C-SAM"), orders, respectively. An order, or the smallest leg of a complex order, must be for at least the minimum size designated by the Exchange (which may not be less than 500 standard option contracts or 5,000 mini-option contracts). The proposed rule change adds that 50,000 micro-option contracts is the corresponding minimum size for orders submitted into SAM or C-SAM Auctions.

- Rule 5.87: Rule 5.87(f) describes when a Floor Broker is entitled to cross a certain percentage of an order, subject to the requirements in that paragraph. Under that Rule, the Exchange may determine on a class-by-class basis the eligible size for an order that may be transacted pursuant to this paragraph; however, the eligible order size may not be less than 50 standard option contracts (or 500 mini-option contracts). The proposed rule change adds that 5,000 micro-option contracts is the corresponding minimum size for orders that may be crossed in accordance with this provision. Additionally, Rule 5.87, Interpretation and Policy .07(a) provides that Rule 5.86(e)[36] does not prohibit a Trading Permit

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[36] Rule 5.86(e) provides that it will be considered conduct inconsistent with just and equitable principles of trade for any TPH or person associated with a TPH, who has knowledge of all material terms and conditions of an original order and a solicited order, including a facilitation order, that matches the original order's limit, the execution of which are imminent, to enter, based on such knowledge, an order to buy or sell an option of the same class as an option that is the subject of the original order, or an order to buy or sell the security underlying such class, or an order to buy or sell any related instrument until either (1) all the terms and conditions of the original order and any changes in the terms and conditions of the original order of which that Trading Permit Holder or associated person has knowledge are disclosed to the trading crowd or (2) the solicited trade can no longer reasonably be considered imminent in view of the passage of time since the solicitation. An order to buy or sell a "related instrument," means, in

Holder ("TPH") from buying or selling a stock, security futures or futures position following receipt of an order, including an option order, but prior to announcing such order to the trading crowd, provided that the option order is in a class designated as eligible for "tied hedge" transactions and within the eligibility size parameters, which are determined by the Exchange and may not be smaller than 500 standard option contracts (or 5,000 mini-option contracts). The proposed rule change adds that 50,000 micro-option contracts is the corresponding minimum size for orders that may qualify as tied hedge transactions and not be deemed a violation of Rule 5.86(e).

Position and Exercise Limits[37]

Rule 8.31 governs position limits for broad-based index options, and currently provides that there are no position limits for broad-based index option contracts (including reduced-value option contracts) on DJX, OEX, XEO, RUT, and SPX classes (among others). With respect to the other broad-based index options that the Exchange currently lists for trading, the Exchange fixes the position limits, which may not be larger than the limits in the following table:

Broad-Based Index	Standard Limit (on the same side of the market)
Russell 1000 Russell	50,000 contracts (no more than 30,000 near-term)

reference to an index option, an order to buy or sell securities comprising ten percent or more of the component securities in the index or an order to buy or sell a futures contract on any economically equivalent index.

37 This discussion focuses on position and exercise limits with respect to indexes on which the Exchange currently lists standard options and may also list micro-options. To the extent the Exchange lists micro-options on other indexes in the future, they would be subject to the same position and exercise limits set forth in the applicable Rules, and similarly aggregated with standard options on the same indexes, as proposed.

1000 Growth Russell 1000 Value	
MSCI Emerging Markets Index MSCI EAFE Index	50,000 contracts
Other	25,000 contracts (no more than 15,000 near-term)

The proposed rule change adds Rule 8.31(f) to provide that positions in micro-options (with an index multiplier of one) will be aggregated with positions in standard options (including reduced-value option contracts) (with an index multiplier of 100) on the same broad-based index and, for purposes of determining compliance with the position limits under Rule 8.31, 100 micro-option contracts with an index multiplier of one equal one standard option contract with an index multiplier of 100. This is consistent with Rule 8.31(d), which similarly provides that positions in reduced-value index options are aggregated with positions in full-value index options based on economic equivalent values of those options.[38]

Rule 8.42(b) governs exercise limits for index options and provides that exercise limits for index option contracts will be equivalent to the position limits prescribed for option contracts with the nearest expiration date in Rule 8.31, 8.32, or 8.34. As is the case for certain broad-based index options as noted above, there are no exercise limits for certain broad-based index options (including reduced-value option contracts). The proposed rule change adds to Rule 8.42(b) that there will similarly be no exercise limits on micro-option contracts on those same broad-based indexes.

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[38] As noted above, an index option with a reduced multiplier has the same practical effect as an index option on a reduced-value index. A micro-option is the economic equivalent to a reduced-value index that is 1/100th of the full-value index.

Capacity

The Exchange has analyzed its capacity and represents that it believes the Exchange and Options Price Reporting Authority ("OPRA") have the necessary systems capacity to handle the additional traffic associated with the listing of new series that may result from the introduction of the micro-options. Because the proposed rule change is limited to broad-based index options overlying indexes with a value of at least 100, which currently represent only 11 (and soon to be 12) of the option classes listed on the Exchange, the Exchange believes any additional traffic that may be generated from the introduction of micro-options will be manageable. The Exchange also understands that the OCC will be able to accommodate the listing and trading of micro-options.

Regulation

The Exchange notes TPHs that enter micro-option orders on behalf of customers, including retail customers, will continue to be subject to all Exchange Rules regarding doing business with the public, including those within Chapter 9 of the Rulebook. A TPH may not accept an option order, including a micro-option order, from a customer unless that customer's account has been approved for options transactions in accordance with Rule 9.1.[39] TPHs that conduct customer business, including retail customer business must ensure they provide for appropriate supervisory control over that business and maintain customer records in accordance with Rule 9.2. TPHs that do business with the public will need to provide customers that trade micro-options (and any other option) with a copy of the ODD and amendments to the ODD in accordance with Rule 9.9 so that

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[39] This includes providing any customers approved for writing uncovered short options transactions with a written description of the risks inherent in writing uncovered short option transactions. See Rule 9.1(f)(5).

customers are informed of any risks associated with trading options, including micro-options.

(b) Statutory Basis

The Exchange believes the proposed rule change is consistent with the Securities Exchange Act of 1934 (the "Act") and the rules and regulations thereunder applicable to the Exchange and, in particular, the requirements of Section 6(b) of the Act.[40] Specifically, the Exchange believes the proposed rule change is consistent with the Section 6(b)(5)[41] requirements that the rules of an exchange be designed to prevent fraudulent and manipulative acts and practices, to promote just and equitable principles of trade, to foster cooperation and coordination with persons engaged in regulating, clearing, settling, processing information with respect to, and facilitating transactions in securities, to remove impediments to and perfect the mechanism of a free and open market and a national market system, and, in general, to protect investors and the public interest. Additionally, the Exchange believes the proposed rule change is consistent with the Section 6(b)(5)[42] requirement that the rules of an exchange not be designed to permit unfair discrimination between customers, issuers, brokers, or dealers.

In particular, the Exchange believes the proposed rule change will remove impediments to and perfect the mechanism of a free and open market and a national market system, and, in general, protect investors and the public interest. The Exchange believes the proposed rule change will expand investor choice and flexibility by providing investors with the ability to gain exposure to the U.S. equities markets using

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40 15 U.S.C. 78f(b).

41 15 U.S.C. 78f(b)(5).

42 Id.

index options with a notional value of 1/100th of the value of current index options. The Exchange believes there is unmet market demand from market participants for micro-options. The availability of micro-options may broaden the base of investors that use options to manage their trading and investment risk, as the Exchange believes they will appeal to retail investors who currently may not participate in the trading of index options. Due to the larger-value of indexes (which generally result in options with five and six figure notional values, as demonstrated above) and corresponding high options premiums, the Exchange believes that investors, most notably average retail investors, would benefit from the availability of micro-options. Micro-options would make currently high-priced options more readily available as an investing tool at more affordable and realistic prices, thus reducing associated investment risk. Micro-options will make available to investors a relatively low-cost method to hedge or speculate on market risk and meet their investment needs associated with index options. The lower cost of micro-options will allow investors to trade index options and hedge their portfolios with a smaller outlay of capital, and thus with less investment risk. This may facilitate overall investor participation in the markets for index options, which may increase the depth and liquidity of these markets, to the benefit of all investors.

The Exchange believes the ability to list micro-options is consistent with several current rules. Particularly, the underlying indexes on which micro-options would be listed satisfied the initial listing standards for index in the Exchange's current Rules and would need to continue to satisfy the maintenance listing criteria in the Rules.[43] Pursuant

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[43] See Rule 4.10.

to the definition of index multiplier[44] in Rule 4.11, the Exchange may determine the index multiplier of an option, which it generally does in the specifications for an index option.[45] Similarly, Article I, Section 1, I(3) of the OCC By-Laws defines "index multiplier" as the dollar amount (as specified by the Exchange on which such contract is traded) by which the current index value is to be multiplied to obtain the aggregate current index value. Unlike the definition of a unit of trading in the OCC By-Laws, which states the unit of trading in is designated by OCC but is 100 shares if not otherwise specified, the definition of index multiplier includes no such default.[46] Therefore, the Exchange believes the current index multiplier definition in the OCC By-Laws (which would have previously been filed with the Commission) permits any index multiplier specified by the listing Exchange given the lack of a default index multiplier for index options (and the inclusion of a default unit of trading for equity options). This is consistent with the lack of default number in Exchange's definition of index multiplier and the ability for the Exchange to specify the index multiplier, as noted above. Additionally, the Exchange believes any potential risks of index options with a multiplier of one are covered by disclosures of the ODD, as it considers the possibility of differing values of index multipliers.[47] However, certain other Rules reflect an index multiplier of

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44 Rule 4.11 defines the term "index multiplier" as the amount specified in the contract by which the current index value is to be multiplied to arrive at the value required to be delivered to the holder of a call or by the holder of a put upon valid exercise of the contract.

45 Option specifications are available on the Exchange's public website, *available at* cboe.com/tradable_products/.

46 See OCC Bylaws Article I, Section 1, U(5).

47 The ODD is available at https://www.theocc.com/about/publications/character-risks.jsp. The ODD states that the exercise price of a stock option is multiplied by the number of shares underlying the option to determine the aggregate exercise

100, and the proposed rule change updates those Rules to reflect the potential listing of an index option with an index multiplier of one.

The listing of micro-options has the same practical effect as the listing of reduced-index value options, which the Exchange (and other options exchanges) currently has the authority to do with respect to several indexes (in accordance with previously Commission-approved rules). For example, the Exchange may list options on both the S&P 500 Index (SPX options) and the Mini-S&P 500 Index (XSP options), which is 1/10th the value of the S&P 500 Index.[48] This is economically equivalent to if the Exchange listed an S&P 500 Index option with an index multiplier of 100 and with an index multiplier of 10, respectively. The proposed rule change will permit the Exchange to make reduced-value options on all indexes available without relying on a reporting authority to create and disseminate a reduced-value index at a reduced-value level that the Exchange believes may be beneficial to the marketplace. The Commission also previously approved a proposed rule change of at least one other options exchange to list reduced-value options on a "micro-index"(which has 1/100th the value of the full index) as well as the full-value index and "mini-index" (which has 1/10th the value of the full index).[49] Similarly, designated contract markets also list index futures (with which the

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price and aggregate premium of that option. See ODD at 18. Similarly, the ODD states that the total exercise price for an index option is the exercise price multiplied by the multiplier, and the aggregate premium is the premium multiplied by the multiplier. See ODD at 8, 9, and 125.

48 The Exchange notes if it desired to list a reduced-value index option on other indexes, or list an option on a micro-level index (i.e., an index with 1/100th the value of the full-sized index), it could do so without Commission approval if the underlying index satisfied the generic listing criteria in Rule 4.12.

49 See, e.g., Securities Exchange Act Release No. 53484 (March 14, 2006), 71 FR 14268 (March 21, 2006) (SR-ISE-2005-25) (order approving proposed change to permit International Securities Exchange ("ISE") to list and trade options on the

Exchange's options contracts compete) with varying multipliers. For example, the Chicago Mercantile Exchange currently lists standard, mini-, and micro- futures on the S&P 500 Index, the Russell 2000, and the DJIA with multipliers of $250, $50 and $5 (which is 1/50th the size of the full-size future), respectively.[50] Therefore, the Exchange believes the availability of micro-options will increase investor choice and promote competition in the listed derivatives markets.

As described above, the proposal contains features designed to protect investors by reducing investor confusion. For example, micro-options will be designated by different trading symbols from their related standard contracts. Additionally, the proposed rule change describes in the Rules the differences regarding the meanings of bids and offers, exercise prices (and thus deliverables), and minimum sizes of index options contracts with a multiplier of one and a multiplier of 100, all of which are adjusted proportionately to reflect the difference in multiplier, and thus the difference in the deliverable value of the underlying.[51] The Exchange believes the transparency and clarity the proposed rule change adds to the Rules regarding the distinctions between index options due to the different multipliers will benefit investors. These proposed

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FTSE 100 Index and FTSE 250 Index based on the full-value of the indexes, one-tenth of the value of the indexes, and one-hundredth of the value of the indexes.

50 See CME contract specifications, *available at* https://www.cmegroup.com/trading/equity-index/us-index/e-mini-sandp500_contract_specifications.html. In addition to these indexes, CME also lists index futures with multipliers of $250 and $50 on several other indexes on which the Exchange also lists index options (and on which the Exchange would be able to list micro-options pursuant to the proposed rule change), including the FTSE Developed Europe Index, the FTSE Emerging Markets Index, the Russell 1000 Index, the Russell 1000 Growth Index, and the Russell 1000 Value Index.

51 These proposed changes correspond to similar provisions for mini-options, which also have a smaller multiplier than standard-sized options.

changes are not novel, as they correspond to similar rule provisions regarding other reduced-value options.[52]

When the Exchange became the first listed options exchange in 1973, we recognized the importance and commitment to education. In 1985, this commitment was formalized with the creation of the Options Institute, the Exchange's education arm. The Options Institutes' mission was, and remains focused on, increasing the understanding of derivatives products and the risk-appropriate use of these financial instruments. The Exchange (and the Options Institute) believe transparency is critical to a fair and orderly market.[53] As we continue to evolve our products and expand access to the marketplace, we in parallel, continue to take steps forward in our educational offerings. We believe the introduction of micro-options will appeal to retail investors and retail brokers. The Exchange believes it has a responsibility to provide education to the public and investor segment about micro-options (including the contract specifications, features, risks, and benefits of the product), as well as the role of an exchange, market structure, the life-cycle of a trade, and derivatives products benefits, uses, and risks. We plan to deliver our education offering using our existing channels and through expanded on-demand, web-based content. In accordance with our responsibility to educate, the Exchange regularly reviews its education content and intends to expand and enhance it as appropriate after the launch of micro-options.

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52 See, e.g., Rules 4.5, Interpretation and Policy .18 (description of strike prices for mini-options, which have a multiplier of 10) and 5.3(c) (description of bids and offers for mini-options).

53 This includes directing investors to the ODD, which is public available and describes risks of all types of options.

Other than these differences, micro-options will trade in the same manner as index options. Each micro-option will be on an index consisting of the same components as the underlying index of standard index options that may currently be listed on the Exchange, but with 1/100th the value of those indexes. Because micro-options and standard index options overlie the same indexes, market participants may use micro-options as hedging vehicles to meet their investment needs in connection with index-related products and cash positions in a similar manner as they do with standard index options, but as a more manageably sized contract. The smaller-sized contract may provide market participants with more precision with respect to hedging their portfolios. Additionally, the smaller size makes micro-options a lower cost option, making it a more affordable and lower risk option for investors, particularly retail investors. Therefore, the Exchange believes it is reasonable and appropriate to be able to list the same expirations and settlements for micro-options as it may for standard index options.

The Exchange believes the proposed rule change for the minimum price increment for micro-options to be the same as the minimum price increment for index options overlying the same index will benefit investors, as it may lessen investor and marketplace confusion. While price protection between micro-options and standard options on the same index is not required, the Exchange believes that consistency between micro-options and standard options as to the minimum price variation is desirable and is designed to promote just and equitable principles of trade. Matching the minimum price increment between micro-options and standard options on the same index would help to eliminate any unnecessary arbitrage opportunities that could result from having contracts on the same underlying index traded in different minimum price

increments. Similarly, the Exchange believes matched minimum pricing may generate enhanced competition among liquidity providers. The Exchange believes that matched pricing for micro-options and standard options on the same index would attract additional liquidity providers who would make markets in micro-options and standard options on the same index. In addition to the possibility of more liquidity providers, the Exchange believes that the ability to quote micro-options and standard options on the same index in the same minimum increments would hopefully result in more efficient pricing via arbitrage and possible price improvement in both contracts on the same index. Finally, having the same minimum increment for micro-options and standard options would be beneficial from a logistical perspective since firms' existing systems are generally configured using the "root symbol" of an underlying index, and it may be difficult and resource-intensive for firms to assign different minimum pricing to micro-options and standard options on the same index.

The Exchange believes the proposed rule change regarding the treatment of micro-options with respect to determining compliance with position and exercise limits is designed to prevent fraudulent and manipulative acts and practices and promote just and equitable principles of trade. Index options with a multiplier of one will be counted for purposes of those limits in a proportional manner to index options (including reduced-value indexes) with a multiplier of 100 and aggregated with options overlying the same index (including reduced-value indexes) in the same manner as index options currently are. This is equivalent to current limits imposed on reduced-value options. As noted above, while the multipliers of reduced-value indexes are $100, a reduced-value index option has an economically equivalent effect to an index option with a smaller multiplier.

An index option with a multiplier of one corresponds to an option overlying a reduced-valued index that is 1/100th the value of the full-value index. It just uses a different multiplier rather than a different value of the underlying index.[54] The Exchange believes its surveillances continue to be designed to deter and detect violations of Exchange Rules, including position and exercise limits and possible manipulative behavior, and those surveillance will apply to index options with a multiplier of one that the Exchange determines to list for trading. Ultimately, the Exchange does not believe that this proposed rule change raises any unique regulatory concerns because existing safeguards — such as position and exercise limits (and the aggregation of options overlying the same index (including reduced-value indexes)) and reporting requirements — would continue to apply.

The Exchange also believes the proposed initial low appointment weight for micro-options will promote competition and efficiency by incentivizing more Market-Makers to obtain an appointment in each micro-option the Exchange lists. The Exchange believes this may result in liquidity and competitive pricing in this class, which ultimately benefits investors. The Exchange does not believe that the proposed rule change is unfairly discriminatory, as the appointment weight will apply to all Market-Makers in the class. Additionally, the proposed appointment weight is the same as the appointment weight for a majority of other Tier AA options classes, as well as a recently listed index option classes to likewise promote Market-Maker appointment, liquidity and competitive

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[54] This is also similar to position limits for other options with multipliers less than 100. See, e.g., Rule 8.30, Interpretation and Policy .08 (describing position limits for mini-options).

The Exchange represents that it has the necessary systems capacity to support the new option series given these proposed specifications. The Exchange believes that its existing surveillance and reporting safeguards are designed to deter and detect possible manipulative behavior which might arise from listing and trading micro-options. The Exchange further notes that current Exchange Rules that apply to the trading of other index options traded on the Exchange will also apply to the trading of micro-options, such as Exchange Rules governing customer accounts, margin requirements and trading halt procedures. The Exchange understands that market participants may currently, and currently do, execute orders in options like the ones being proposed in the unregulated OTC options market, where neither the Exchange nor the Commission has oversight over market participants that may be purposely trading at prices through the listed market. As discussed below, the proposed rule change may encourage these orders to be submitted to the Exchange, which could bring these orders into a regulated market and be subject to surveillance and oversight to which they are currently not subject with respect to execution of these option orders.

The Exchange does not believe the proposed rule change raises any price protection concerns due to the possibility of having economically equivalent options overlying the same index listed with different multipliers. This possibility exists today with respect to indexes on which the Exchange may list full- and reduced-value index options (subject to any applicable regulatory requirements) as well as economically equivalent index and ETF options. Some reduced-value indexes are 1/10th the value of the full-value index, while others are 1/100th the value of the full-value-index. For indexes on which the Exchange may currently list full- and reduced-value options, while

the index multipliers of reduced-value indexes are 100, the reduced value has a similar effect as a smaller multiplier. Ultimately, while these options may be economically equivalent, they are different products, and market participants price them to incorporate not only the economic and notional value, but also trading costs, which may differ for each product. The Exchange has observed no trading activity that raises concerns that market participants may be trading in one product as a reason to trade-through the market of an economically equivalent product.

While the Exchange may ultimately list micro-options that are economically equivalent to index options with a 100 multiplier, the Exchange similarly has no concerns that this will lead to such behavior. The Exchange expects that Market-Makers with appointments in index options may seek appointment in micro-options overlying the same indexes. As noted above, the Exchange understands the systems Market-Makers use to price the quotes they stream in their appointed classes (which quotes generally set market prices for series in these classes) use the same tools and methodologies to determine theoretical values for options overlying the same index. For example, a Market-Maker prices its quotes for SPX and XSP in the same manner, while incorporating factors that distinguish the products (for example, the smaller index value of XSP and differing costs to trade each product). As a result, the Exchange believes there is consistency in pricing across the markets of economically equivalent products, as it would be unlikely for a Market-Maker, for example, to pay more for an XSP option than it would for an equivalent SPX option (excluding the impact of differing trading costs). Therefore, Market-Makers that quote in index options on the Exchange today would be able to price quotes in micro-options using the same tools, updated to similarly incorporate the applicable differences

between micro-options and the index options with a multiplier of 100 overlying the same index, and as a result expects consistent pricing across these markets. The Exchange believes this minimizes any price protection concerns related to the listing of micro-options.

Additionally, the Exchange has observed no fragmentation of liquidity in the markets for economically equivalent products that are listed today, nor does it believe the proposed rule change will result in any fragmentation of liquidity due to the listing of economically equivalent products. As noted above, the Exchange expects micro-options to generate new order flow to the Exchange, particularly from retail investors. Additionally, because Market-Makers have systems in place to price options overlying the same index, the Exchange understands Market-Makers would be able to price micro-options using their current systems with moderate updates to incorporate trading costs and other relevant differences. And because of the small notional value of micro-options, the Exchange believes quoting in micro-options would not have a significant impact on the risk Market-Makers must take on or on their capital requirements as a result of such quoting. Ultimately, Market-Makers generally "follow the order flow" and stream quotes in series in which there is more order flow (and thus more demand). Therefore, if there is new order flow in micro-options, the Exchange expects Market-Makers would seek to quote in those options and compete for that order flow.[55]

The Exchange does not anticipate market participants diverting their current order flow from index options with 100 multipliers to micro-options. First, as discussed above,

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[55] Ultimately, when it comes to customer order flow against which Market-Makers' quotes can execute, as those immortal words say, "if you build it, [they] will come." See *Field of Dreams*, (1989) [film]. Directed by P. Robinson; see also https://www.youtube.com/watch?v=o3c_pJ_CLJQ.

the Exchange believes micro-options will be a point of entry for investors that may currently be priced out of index options due to their high notional value and corresponding high options premiums. As a result, the Exchange believes micro-options will create new customer order flow on the Exchange. Second, it may not make financial sense for market participants to move order floor from an index option with a 100 multiplier to a micro-option if the market participant intends to trade more than one index option with a 100 multiplier. This is because one index option contract is equivalent to 100 micro-option contracts. In addition to transaction fees charged by the Exchange (which are charged per contract),[56] other fees applicable to options transactions are often charged on a per contract basis. For example, the OCC charges $0.045 per contract for trades with contracts up to 1,222. Therefore, to clear a trade of one index option with a 100 multiplier, OCC would charge $0.045. However, to clear 100 micro-options, OCC would charge $4.50. In addition to the fees charged by OCC, the Exchange understands that clearing firms generally charge on a per contract basis, as do many brokers. Therefore, it would make little financial sense for a market participant to trade 100 times the number of contracts in the micro-option market if it can trade one economically equivalent contract in the index option with a 100 multiplier.

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[56] While the Exchange has not yet determined transaction fees to be charged for micro-options, we expect to price micro-options in a similar manner as we do other reduced-value index options. Specifically, we generally adopt prices for reduced-value index options that are approximately proportional to the full-value index options. See Cboe Fees Schedule. For example, we recently adopt MRUT transaction fees, which were approximately 1/10th the transaction fees for RUT options (as the Mini-Russell 2000 Index is 1/10th the size of the Russell 2000 Index). See Securities Exchange Act Release No. 91288 (March 10, 2021) (SR-CBOE-2021-015). The Exchange notes while its transaction fees for micro-options will be approximately proportional to the transaction fees for standard-sized options, the Exchange has no control over other fees that may apply to option trading (including brokerage and clearing fees).

Theoretically, the only market participants the Exchange expects would consider moving volume from current index options to micro-options are those that trade one lots, because they want access to index options but in the current smallest amount possible (i.e. one contract). Additionally, the Exchange believes retail investors generally trade shorter-term options, and thus the Exchange believes the only potential one lots that would move to the micro-option market would be those in series with no more than seven days until expiration. In 2020, of total volume in six index options that trade on Cboe and its affiliated options exchange, approximately 0.3% consisted of one lot orders in options with no more than seven days until expiration (in no class was this percentage more than 0.5%), and approximately 1.1% consisted of one lot orders in options with any expiration (in no class was this percentage more than 2.1%). Similarly, in 2020, of total volume in corresponding ETF options executed on Cboe and its affiliated options, approximately 1% consisted of one lot orders in options with no more than seven days until expiration (in no class was this percentage more than 1.6%), and approximately 2.4% consisted of one lot orders in options with any expiration (in no class was this percentage more than 2.7%). While the Exchange expects little, if any, of this volume to move to micro-options (because the Exchange believes they will appeal to investors not currently trading index options), even if all of this volume moved to the micro-options market, it represents a very small portion of volume in these options. Therefore, significant order flow would remain in index options and ETF options that track index options with 100 multipliers, and as a result, Market-Makers would continue to quote in these products and compete for that volume. As discussed above, rather than cause market participants to change their

order flow from currently listed options, the Exchange believes the proposed rule change will draw new volume to the Exchange and, thus, will not cause any market fragmentation.

A robust and competitive market requires that exchanges respond to investors' evolving needs by constantly improving their offerings. When Congress charged the Commission with supervising the development of a "national market system" for securities, Congress stated its intent that the "national market system evolve through the interplay of competitive forces as unnecessary regulatory restrictions are removed.[57] Consistent with this purpose, Congress and the Commission have repeatedly stated their preference for competition, rather than regulatory intervention to determine products and services in the securities markets.[58] This consistent and considered judgment of Congress and the Commission is correct, particularly in light of evidence of robust competition in the options trading industry. The fact that an exchange proposed something new is a reason to be receptive, not skeptical — innovation is the life-blood of a vibrant competitive market — and that is particularly so given the continued internalization of the securities markets, as exchanges continue to implement new

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57 See H.R. Rep. No. 94-229, at 92 (1975) (Conf. Rep.).

58 See S. Rep. No. 94-75, 94th Cong., 1st Sess. 8 (1975) ("The objective [in enacting the 1975 amendments to the Exchange Act] would be to enhance competition and to allow economic forces, interacting within a fair regulatory field, to arrive at appropriate variations in practices and services."); Order Approving Proposed Rule Change Relating to NYSE Arca Data, Securities Exchange Act Release No. 59039 (December 2, 2008), 73 FR 74770 (December 9, 2008) ("The Exchange Act and its legislative history strongly support the Commission's reliance on competition, whenever possible, in meeting its regulatory responsibilities for overseeing the [self-regulatory organizations] and the national market system. Indeed, competition among multiple markets and market participants trading the same products is the hallmark of the national market system."); and Regulation NMS, 70 FR at 37499 (observing that NMS regulation "has been remarkably successful in promoting market competition in [the] forms that are most important to investors and listed companies").

products and services to compete not only in the United States but throughout the world. Options exchanges continuously adopt new and different products and trading services in response to industry demands in order to attract order flow and liquidity to increase their trading volume. This competition has led to a growth in investment choices, which ultimately benefits the marketplace and the public. The Exchange believes that the proposed rule change will help further competition by providing market participants with yet another investment option for the listed options market.

Item 4. Self-Regulatory Organization's Statement on Burden on Competition

The Exchange does not believe that the proposed rule change will impose any burden on competition that is not necessary or appropriate in furtherance of the purposes of the Act. The Exchange does not believe that the proposed rule change will impose any burden on intramarket competition that is not necessary or appropriate in furtherance of the purposes of the Act as any micro-options the Exchange lists for trading will be available for all market participants in the same manner who wish to trade such options. The Exchange may list micro-options on all indexes currently authorized to be listed on the Exchange, subject to the same listing criteria. These options will trade in the same manner as index options with a multiplier of 100, with certain terms proportionately adjusted to reflect the different contract multipliers. Additionally, the Exchange believes that the proposed rule change will enhance competition by allowing products on the same index to be priced in the same minimum price increments. The Exchange also believes the proposed initial low Market-Maker appointment cost for micro-options will apply equally to all Market-Makers with an appointment in micro-options and will promote competition by incentivizing more Market-Makers to obtain an appointment in the newly listed class, resulting in liquidity and competitive pricing within the class.

The Exchange also believes limiting the filing to broad-based index options is reasonable, as broad-based index options will provide retail investors with access to products they can use to gain efficient exposure to the U.S. equity market and execute risk management and hedging strategies for their entire portfolio in a more economical manner (rather than trying to hedge positions for each security). For example, if a retail investor has positions in 20 different stocks, rather than protect against downside moves by buying a put for each underlying (i.e., 20 options),[59] the investor could instead buy a single put for a broad-based index option and cover the risk of that entire portfolio with a single option for which the maximum loss is known (i.e., the price of the premium paid for the option). In other words, index options can provide retail investors with a risk management tool to hedge against a downturn in the U.S. equities market while they retain positions in securities the prices of which the investors believe may continue to rise.[60] Additionally, exposure to broad-based index options may be less risky for short-term investments (which are common among retail investors) than exposure to single-stock options. Broad-based indexes generally have much lower long-term realized and implied volatility (and thus less risk) compared to equities. This lower volatility combined with the breadth and depth of the market liquidity makes options on broad-based indexes less risky than equity options, for which the volatility and risk can be 10 to

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59 An investor's purchase of multiple options (compared to a single option) could significantly increase the investor's overall execution cost, risk, and complexity associated with trying to create a hedge. The purchase of a single option could, therefore, reduce these execution burdens on the investor.

60 The Exchange also believes it is reasonable to limit micro-options to broad-based indexes with values of at least 100, as indexes with smaller values would have smaller notional values and thus create less of a barrier to entry for retail investors. Therefore, the Exchange believes demand for a smaller multiplier for smaller-valued indexes would be minimal at this time.

30 times greater than broad-based index options. As noted above, the one multiplier reduces the premium level for index options. Currently, for a retail investor to trade at a $5 to $10 premium level, which is consistent with a smaller $1,000 to $5,000 account's trading size, that investor would need to invest in extremely far out-of-the-money index options. More commonly, retail investors instead are forced to trade options on low-priced single-stock equity options. By offering a $5 to $10 price point for broad-based index options, micro-options will provide retail investors with a less risky hedging vehicle. The Exchange believes a lower premium micro-option will provide retail investors with a more compelling alternative to purchases of ETFs (or options on ETFs) for investors seeking exposure to broad market moves. For example, a $3 XSP call option can lose only the $3 premium spent, whereas a long position a SPY option can lose a significantly higher premium. On average, more than 100,000 one lot SPY options with an expiration of fewer than seven days trades daily. Recently, the average premium of these options was approximately $165, which would be the maximum loss for investors that purchase any such options. The Exchange believes, based on this information, there are market participants that would prefer a lower premium level to achieve this market exposure that micro-options can provide. In other words, a one multiplier is a cleaner way to "fractionate" options liquidity to provide access to smaller accounts. Therefore, the Exchange believes micro-options could reduce retail reliance on higher volatility products by reducing the price access point of index options, which currently may be driving retail participation to single stocks and derivatives on those stocks.

The Exchange does not believe the proposed rule change will impose any burden on intermarket competition that is not necessary or appropriate in furtherance of the purposes of the Act because micro-options may only be listed for trading on the Exchange. To the extent that the availability of these products makes the Exchange a more attractive marketplace to market participants at other exchanges, market participants are free to elect to become market participants on the Exchange. As noted above, other derivative products related to these indexes are listed for trading on other exchanges. Additionally, the Exchange notes that listing and trading micro-options on the Exchange will subject such options to transparent exchange-based rules as well as price discovery and liquidity, as opposed to alternatively trading these products in the OTC market. As discussed above, the Exchange does not believe the proposed rule change will result in any fragmentation of the market.

The Exchange believes that the proposed rule change may relieve any burden on, or otherwise promote, competition. The proposal is designed to increase competition for order flow on the Exchange in a manner that is beneficial to investors by providing them with a lower-cost option to hedge their investment portfolios and to remove a potential barrier to entry into the index option market for retail investors. The Exchange notes that it operates in a highly competitive market in which market participants can readily direct order flow to competing venues who offer similar products. The Exchange believes the proposed rule change encourages competition amongst market participants to provide lower-priced (and thus lower risk) and more granular option products, which may appeal to all market participants, including retail investors.

Item 5. Self-Regulatory Organization's Statement on Comments on the Proposed Rule Change Received from Members, Participants, or Others

The Exchange neither solicited nor received comments on the proposed rule change.

Item 6. Extension of Time Period for Commission Action

Not applicable.

Item 7. Basis for Summary Effectiveness Pursuant to Section 19(b)(3) or for Accelerated Effectiveness Pursuant to Section 19(b)(2) or Section 19(b)(7)(D)

(a) Not applicable.

(b) Not applicable.

(c) Not applicable.

(d) This Amendment No. 1 is filed for accelerated effectiveness pursuant to Section 19(b)(2) of the Act.[61] The Exchange requests that the Commission approve the Amendment No. 1 on an accelerated basis pursuant to Section 19(b)(2) of the Act so that it may be operative as soon as practicable. This Amendment No. 1 only narrows the scope of the proposed rule change as set forth in the Initial Rule Filing to broad-based index options overlying indexes that have a value of at least 100 and to non-FLEX options, as well as adds support for the proposed rule change, but makes no other substantive changes to the proposal. The Exchange believes accelerated approval will benefit investors, including retail investors, by permitting the Exchange to make currently high-priced options more readily available as an investing tool and at more affordable and realistic prices and thus with reduced investment risk as soon as possible. As

[61] 15 U.S.C. 78s(b)(2).

discussed above, the Exchange believes the proposed rule change will expand investor choice and flexibility by providing investors with the ability to gain exposure to the market or specific industries using index options with a notional value of 1/100th of the value of current index options. The Exchange believes there is unmet market demand from market participants for micro-options. The availability of micro-options may broaden the base of investors that use options to manage their trading and investment risk, as the Exchange believes they will appeal to retail investors who currently may not participate in the trading of index options. Micro-options will make available to investors a relatively low-cost method to hedge or speculate on market risk and meet their investment needs associated with index options. The lower cost of micro-options will allow investors to trade index options and hedge their portfolios with a smaller outlay of capital, and thus with less investment risk. This may facilitate overall investor participation in the markets for index options, which may increase the depth and liquidity of these markets, to the benefit of all investors.

As discussed above, listing options with a reduced multiplier is not novel. The concept of an index multiplier other than 100 is contemplated in the Exchange Rules, as well as the OCC Rules (and is covered by disclosures in the ODD). Other than the differences specified above, micro-options will trade in the same manner as index options. Each micro-option will be on an index that already satisfies initial and maintenance listing criteria in Rule 4.10, and thus the underlying index of each micro-option consists of the same components as the underlying index of each standard index option. A micro-option will merely have 1/100th the value of a standard option overlying the same index. Micro-options may be listed with the same expirations and settlements as standard index options.

The proposed rule change merely updates other Rules to reflect the potential listing of an index option with an index multiplier of one and the differences between options with an index multiplier of 100 and with an index multiplier of one. These proposed changes, including to the Rules regarding the meaning of bids and offers, exercise prices, and contract size requirements for certain functionality, which are adjusted proportionately to reflect the difference in multiplier, as well as minimum increments, correspond to current provisions applicable to the listing of mini-options, which similar to micro-options have a reduced multiplier.[62] As described above, the proposal also contains a number of features designed to protect investors by reducing investor confusion. The Exchange does not believe that this proposed rule change raises any unique regulatory concerns because existing safeguards — such as position and exercise limits (and the aggregation of options overlying the same index (including reduced-value indexes)) and reporting requirements — would continue to apply.

As discussed above, the listing of micro-options has the same practical effect as the listing of reduced-index value options, which the Exchange (and other options exchanges) currently has the authority to do with respect to several indexes (in accordance with previously Commission-approved rules). The Commission also previously approved a proposed rule change of at least one other options exchange to list reduced-value options on a "micro-index"(which has 1/100th the value of the full index) as well as the full-value index and "mini-index" (which has 1/10th the value of the full

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62 See, e.g., Rules 4.5, Interpretation and Policy .18 (description of strike prices for mini-options, which have a multiplier of 10), 5.3(c) (description of bids and offers for mini-options), 5.4(a) (minimum increment for mini-options), 5.37(b) and (c) and 5.38(c) (stop price for simple AIM Agency orders and restriction on concurrent AIM and C-AIM Auctions), 5.39(a)(3) and 5.40(a)(3) (minimum size of SAM and C-SAM Agency Orders).

index).[63] Similarly, designated contract markets also list index futures with varying multipliers on indexes on which the Exchange currently lists index options. Accelerated approval of the proposed rule change will permit the Exchange to make available as soon as possible lower-priced, reduced-value options on indexes currently authorized for listing under the Rules without a reporting authority creating and disseminating reduced-value indexes that the Exchange believes may benefit the marketplace. The Exchange notes if a reporting authority did create and disseminate micro-level indexes (i.e., an index with 1/100th the value of the full-sized index), the Exchange could list options on those indexes without Commission approval if the underlying indexes satisfied the generic listing criteria in Rule 4.12. Therefore, the Exchange believes accelerated approval will increase investor choice and promote competition in the listed derivatives markets as soon as possible.

Item 8. Proposed Rule Change Based on Rules of Another Self-Regulatory Organization or of the Commission

The proposed rule change is not based on a rule either of another self-regulatory organization or of the Commission.

Item 9. Security-Based Swap Submissions Filed Pursuant to Section 3C of the Act

Not applicable.

Item 10. Advance Notices Filed Pursuant to Section 806(e) of the Payment, Clearing and Settlement Supervision Act

Not applicable.

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63 See, e.g., Securities Exchange Act Release No. 53484 (March 14, 2006), 71 FR 14268 (March 21, 2006) (SR-ISE-2005-25) (order approving proposed change to permit International Securities Exchange ("ISE") to list and trade options on the FTSE 100 Index and FTSE 250 Index based on the full-value of the indexes, one-tenth of the value of the indexes, and one-hundredth of the value of the indexes.

Item 11. Exhibits

Exhibit 1. Completed Notice of Proposed Rule Change for publication in the Federal Register.

Exhibit 4. Marked copy of changes to the rule text proposed in an amendment compared against the version of the rule text that was initially filed.

Exhibit 5. Proposed rule text.

EXHIBIT 1

SECURITIES AND EXCHANGE COMMISSION

[Release No. 34- ; File No. SR-CBOE-2020-117]

[Insert date]

Self-Regulatory Organizations; Cboe Exchange, Inc.; Notice of Filing of a Proposed Rule Change Relating to Amend Certain Rules to Accommodate the Listing and Trading of Certain Index Options with an Index Multiplier of One

Pursuant to Section 19(b)(1) of the Securities Exchange Act of 1934 (the "Act"),[1] and Rule 19b-4 thereunder,[2] notice is hereby given that on [insert date], Cboe Exchange, Inc. (the "Exchange" or "Cboe Options") filed with the Securities and Exchange Commission (the "Commission") the proposed rule change as described in Items I, II, and III below, which Items have been prepared by the Exchange. The Commission is publishing this notice to solicit comments on the proposed rule change from interested persons.

I. Self-Regulatory Organization's Statement of the Terms of Substance of the Proposed Rule Change

Cboe Exchange, Inc. (the "Exchange" or "Cboe Options") proposes to amend certain Rules to accommodate the listing and trading of certain index options with an index multiplier of one. The text of the proposed rule change is provided in Exhibit 5.

The text of the proposed rule change is also available on the Exchange's website (http://www.cboe.com/AboutCBOE/CBOELegalRegulatoryHome.aspx), at the Exchange's Office of the Secretary, and at the Commission's Public Reference Room.

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1 15 U.S.C. 78s(b)(1).

2 17 CFR 240.19b-4.

II. Self-Regulatory Organization's Statement of the Purpose of, and Statutory Basis for, the Proposed Rule Change

In its filing with the Commission, the Exchange included statements concerning the purpose of and basis for the proposed rule change and discussed any comments it received on the proposed rule change. The text of these statements may be examined at the places specified in Item IV below. The Exchange has prepared summaries, set forth in sections A, B, and C below, of the most significant aspects of such statements.

A. Self-Regulatory Organization's Statement of the Purpose of, and Statutory Basis for, the Proposed Rule Change

1. Purpose

The purpose of this proposed rule change is to amend certain rules to accommodate the listing and trading of broad-based index options that have an index value of at least 100 with an index multiplier of one ("micro-options").[3] The Exchange may list options on broad-based indexes that satisfy the initial and maintenance criteria in Rule 4.10, and currently lists options on 12 broad-based indexes with an underlying index value of at least 100. The following table lists the broad-based indexes that have an index value of at least 100 on which the Exchange currently lists options, as well as the current value of the index as of the close of trading on March 30, 2021[4]:

Index (Option Symbol)	**Current Value**
S&P 500 Index (SPX)	3,958.55

[3] The Exchange intends to file a Form 19b-4(e) with the Commission for any index option it lists for trading with an index multiplier of one pursuant to Rule 19b-4(e) of the Act.

[4] The Exchange intends to initially list micro-options on only a single index and may expand the listing of micro-options in the future in response to customer demand for such additional products.

Mini-S&P 500 Index (XSP)	395.86
Russell 2000 Index (RUT)	2,195.80
Mini-Russell 200 Index (MRUT)	219.58
Dow Jones Industrial Average (DJX)	330.67[5]
S&P 100 Index (OEX and XEO)	1,792.63
S&P 500 ESG Index (SPESG)	336.30
MSCI EAFE Index (MXEA)	2,216.07
MSCI Emerging Markets Index (MXEF)	1,319.50
Russell 1000 Growth Index (RLG)	2,412.94
Russell 1000 Value Index (RLV)	1,500.12
Russell 1000 Index (RUI)	2,228.28

Pursuant to the definition of index multiplier[6] in Rule 4.11, the Exchange may determine the index multiplier of an option, which it generally does in the specifications for an index option.[7] Similarly, Article I, Section 1, I(3) of the Options Clearing Corporation ("OCC") By-Laws defines "index multiplier" as the dollar amount (as specified by the Exchange on which such contract is traded) by which the current index value is to be multiplied to obtain the aggregate current index value. Unlike the

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5 Options are based on 1/100th of the full value of the Dow Jones Industrial Average ("DJIA").

6 Rule 4.11 defines the term "index multiplier" as the amount specified in the contract by which the current index value is to be multiplied to arrive at the value required to be delivered to the holder of a call or by the holder of a put upon valid exercise of the contract. The Exchange included the proposed index multiplier in rule filings for certain products.

7 Option specifications are available on the Exchange's public website, *available at* cboe.com/tradable_products/. Currently, the Exchange has designated an index multiplier of 100 for indexes it currently lists for trading.

definition of a unit of trading for stock options in the OCC By-Laws, which states the unit of trading in is designated by OCC but is 100 shares if not otherwise specified, the definition of index multiplier includes no such default.[8] Therefore, the Exchange believes the current index multiplier definition in the OCC By-Laws (which would have previously been filed with the Commission) permits any index multiplier specified by the listing Exchange given the lack of a default index multiplier for index options (and the inclusion of a default unit of trading for equity options). This is consistent with the lack of default number in Exchange's definition of index multiplier and the ability for the Exchange to specify the index multiplier, as noted above. However, certain other Rules reflect an index multiplier of 100, and the proposed rule change updates those Rules to reflect the potential for an index multiplier of one.

Additionally, the Exchange believes micro-options are covered by the disclosures in the Options Disclosure Document ("ODD"). The ODD reflects the possibility of differing values of index multipliers when describing features of index options.[9] Specifically, the ODD states the total exercise price for an index option is the exercise price multiplied by the multiplier, and the aggregate premium is the premium multiplied by the multiplier.[10] As a result, the risk disclosures regarding index options in the ODD

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8 See OCC Bylaws Article I, Section 1, U(5)

9 The ODD is available at https://www.theocc.com/about/publications/character-risks.jsp. The ODD states that the exercise price of a stock option is multiplied by the number of shares underlying the option to determine the aggregate exercise price and aggregate premium of that option. See ODD at 18. Similarly, the ODD states that the total exercise price for an index option is the exercise price multiplied by the multiplier, and the aggregate premium is the premium multiplied by the multiplier. See ODD at 8, 9, and 125.

10 See ODD at 8, 9, and 125.

currently cover any risks associated with option index options with multipliers of one (and other amounts).

Currently, the Exchange has designated an index multiplier of 100 for all index options it lists for trading. The proposed rule change amends various rules regarding index options to permit the Exchange to designate an index multiplier of one for broad-based indexes that (that have an index value of at least 100) on which it may list options. Micro-options will trade in the same manner as index options.[11] The table below demonstrates the differences between a micro-option and a standard index option on, for example, the SPX Index:

Term	**Standard (Index Multiplier of 100)**	**Micro (Index Multiplier of 1)**
Strike Price	3930	3930
Bid or offer	32.05	32.05
Total Value of Deliverable	$393,000	$3,930
Total Value of Contract	$3,205	$32.05

To the extent the Exchange lists a micro-option on an index on which it also lists a standard index option, it will be listed with a different trading symbol than the standard index option with the same underlying index to reduce any potential confusion.[12] The Exchange believes that the clarity of this approach is appropriate and transparent. The Exchange recognizes the need to differentiate micro-option contracts from standard

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[11] The proposed rule change defines "micro-options" in Rule 4.11 as a broad-based index option for which the value of the underlying index is at least 100 with an index multiplier of one. The proposed rule change adds that references to "index option" in the Rules include "micro-option" unless the context otherwise requires.

[12] For example, a standard index option for index ABC with an index multiplier of 100 may have symbol ABC, while a micro-option for index ABC with a multiplier of one may have symbol ABC9.

option contracts and believes the proposed rule change will provide the necessary differentiation.

The Exchange believes micro-options will expand investors' choices and flexibility by listing and trading option contracts on index options, which provide investors with the ability to gain exposure to the market, with a notional value of 1/100th of the value of current index options. The Exchange believes lower-valued micro-options may appeal to retail investors who currently may not participate in the trading of index options, because index options are generally higher-priced securities due to the high levels of the indexes.[13] In other words, the Exchange believes micro-options could provide retail investors with a point of entry into the index options market, which will make options overlying larger-valued broad-based indexes more readily available as investing and hedging tools at more affordable and realistic prices, which would ultimately reduce investment risk. For example, with SPX at a value of 3906.71 on February 19, 2021, the notional value of an SPX option with an index multiplier of 100 was $390,671. Suppose on that date, a March SPX 3930 call was traded at $32.05, the cost of that option would have been $3,205 given the index multiplier of 100. Proportionately equivalent SPX micro-options would have provided investors with the ability to trade at the much lower price of $32.05 per contract.

To demonstrate the benefits of an index option with a smaller multiplier for a retail investor, consider a retail investor with $5,000 in her account. She makes options trades on average twice a month to add protection to her portfolio (equaling 24 options

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[13] The proposed rule change will not permit FLEX Options to have a one multiplier. The Exchange intends to submit a separate proposal to permit FLEX Options to have a one multiplier.

traders per year). Suppose SPESG has an index value of 400, and a 400 strike call with one day to expiration is priced at $1.75. With a 100 multiplier, one contract for this call option would cost $175. If this investor made this trade 24 times during a one year period, that would be a total cost of $4,200 ($175 x 24), which represents 84% of her total account value of $5,000. With a one multiplier contract, one contract for this call option would cost $1.75, for a total of $42 during a one-year period (assuming 24 trades), which represents only 0.84% of the total value of her account. Therefore, micro-options could provide this retail investor with a far more cost-effective way to trade index options.

The Exchange also believes limiting the filing to broad-based index options is reasonable, as broad-based index options will provide retail investors with access to products they can use to gain efficient exposure to the U.S. equity market and execute risk management and hedging strategies for their entire portfolio in a more economical manner (rather than trying to hedge positions for each security). For example, if a retail investor has positions in 20 different stocks, rather than protect against downside moves by buying options for each underlying stock (i.e., 20 options), the investor could instead buy a single put for a broad-based index option and cover the risk of that entire portfolio with a single option for which the maximum loss is known (i.e., the price of the premium paid for the option).[14] In other words, index options can provide retail investors with a risk management tool to hedge against a downturn in the U.S. equities market while they

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[14] An investor's purchase of multiple options (compared to the purchase of a single option) could significantly increase the execution cost, risk, and complexity associated with trying to create a hedge on the investor's portfolio. If an investor was able to instead purchase an affordable single option to create a hedge, it would reduce the execution burden on the investor.

retain positions in securities the prices of which the investors believe may continue to rise.[15]

Additionally, exposure to broad-based index options may be less risky for short-term investments (which are common among retail investors) than exposure to single-stock options. Broad-based indexes generally have much lower long-term realized and implied volatility (and thus less risk) compared to equities. This lower volatility combined with the breadth and depth of the market liquidity generally makes options on broad-based indexes less risky than equity options, for which the volatility and risk can be 10 to 30 times greater than broad-based index options. As noted above, the one multiplier reduces the premium level for index options. Currently, in order for a retail investor to trade at a $5 to $10 premium level, which is consistent with a smaller $1,000 to $5,000 account's trading size, that investor would need to invest in extremely far out-of-the-money index options. More commonly, retail investors instead are forced to trade options on low-priced single-stock equity options. By offering a $5 to $10 price point for broad-based index options, micro-options will provide retail investors with a less risky hedging vehicle. The Exchange believes a lower premium micro-option will provide retail investors with a more compelling alternative to purchases of ETFs (or options on ETFs) for investors seeking exposure to broad market moves. For example, a $3 XSP call option can lose only the $3 premium spent, whereas a long position a SPY option can lose a significantly higher premium. On average, more than 100,000 one lot SPY options

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15 The Exchange also believes it is reasonable to limit micro-options to broad-based indexes with values of at least 100, as indexes with smaller values would have smaller notional values and thus create less of a barrier to entry for retail investors. Therefore, the Exchange believes demand for a smaller multiplier for smaller-valued indexes would be minimal at this time.

with an expiration of fewer than seven days trades daily. Recently, the average premium of these options was approximately $165, which would be the maximum loss for investors that purchase any such options. The Exchange believes, based on this information, there are market participants that would prefer a lower premium level to achieve this market exposure that micro-options can provide. In other words, a one multiplier is a simpler way to "fractionate" options (i.e., buy an index option with a smaller value rather than buy a portion of an index option with a 100 multiplier to achieve the same result) liquidity to provide access to smaller accounts (as opposed to, for example, fractional options) and reduce the price access point of index options. Therefore, the Exchange believes micro-options listed on broad-based indexes, which are expected to have significantly smaller premiums than current options on those indexes, will provide retail investors with an attractive investment alternative to the products currently available in the market that have similar price points (such higher volatility single stocks and derivatives on those stocks).

Trading Hours

Micro-options will be available for trading during the same hours as standard index options pursuant to Rule 5.1(b)(2). Therefore, Regular Trading Hours for micro-options will generally be 9:30 a.m. to 4:15 p.m. Eastern time.[16] To the extent an index option is authorized for trading during Global Trading Hours, the Exchange may also list micro-options during that trading session as well, the hours for which trading session are 3:00 a.m. to 9:15 a.m. Eastern time.

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[16] Certain indexes close trading at 4:00 p.m. Eastern time. See Rule 5.1.

Expiration, Settlement, and Exercise Style

The Exchange may list a micro-option on an index with the same expirations, settlements, and exercise styles as the standard index option overlying the same index. Consistent with existing rules for index options, the Exchange will generally allow up to six standard monthly expirations for micro-options[17] as well as up to 10 expiration months for LEAPS.[18] For certain specified index options (including EAFE, EM, and SPESG options) and any class that the Exchange (as the Reporting Authority) uses to calculate a volatility index (currently, only SPX options are used by the Exchange to calculate a volatility index), the Exchange may list up to 12 standard monthly expirations for micro-options on those indexes.[19] The Exchange may also list up to the same maximum number of expirations permitted in Rule 4.13(a)(2) for micro-options on broad-based index options with nonstandard expirations in accordance with the Nonstandard Expirations Pilot Program (as further discussed below).[20] Micro-options on broad-based indexes will be cash-settled contracts with European-style exercise in accordance with the listing criteria for those options.[21] Micro-options, like standard index options, with third-Friday expiration will also be A.M.-settled or P.M.-settled, as applicable, in accordance with the applicable listing criteria.[22]

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17 See Rule 4.13(a)(2).

18 See Rule 4.13(b). Index LEAPS may expire 12 to 180 months from the date of issuance.

19 See Rule 4.13(a).

20 See Rule 4.13(e).

21 See Rule 4.10(f) (broad-based initial listing criteria) and (h) (EAFE and EM); see also Rule 4.13(a)(3).

22 See id.

As it does for certain standard index options, the Exchange may list micro-options over the same indexes with P.M.-settlement in certain instances (in addition to A.M.-settlement in accordance with the generic listing terms). Specifically, pursuant to Rule 4.13(c), the Exchange may open for trading Quarterly Index Expirations ("QIXs") on certain specified index options. QIXs are index option contracts that expire on the last business day of a calendar quarter, and the Exchange may list up to eight near-term quarterly expirations for trading.[23] Currently, the index multiplier for QIXs may be 100 or 500. The proposed rule change amends Rule 4.13(c) to permit the index multiplier to also be one to accommodate the listing of QIX micro-options on the specified indexes.

In addition, the Exchange's Nonstandard Expirations Pilot Program currently allows it to list Weekly and End of Month ("EOM") Expirations on any broad-based index.[24] Weekly and EOM options are P.M.-settled and may expire on any Monday, Wednesday, or Friday (other than the third Friday of the month or days that coincide with an EOM expiration) or on the last trading day of the month. Like standard index options with Weekly and EOM Expirations, micro-options on broad-based indexes with Weekly and EOM Expirations will be P.M.-settled and otherwise treated the same as options on the same underlying index that expire on the third Friday of the month. The maximum number of expirations that may be listed for each of Weeklys and EOMs in a micro-option is the same as the maximum number of expirations permitted in Rule 4.13(a)(2) (as described above) for micro-options on the same broad-based index.[25] The Exchange may currently list Weekly and EOM Expirations on broad-based indexes as a pilot, which

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23 See Rule 4.13(c).

24 See Rule 4.13(e).

25 See id.

pilot period currently expires on May 3, 2021. The Exchange currently submits regular reports and data to the Commission regarding the Nonstandard Expirations Pilot Program. To the extent the Exchange lists any micro-options with Weekly or EOM Expirations pursuant to this pilot program, the Exchange will include the same information with respect to micro-options that it does for standard options in the reports it submits to the Commission in accordance with the pilot program.

Similarly, the Exchange also currently has in place a pilot program under Rule 4.13, Interpretation and Policy .13 that allows the Exchange to list options on specified indexes that expire on the third Friday of the month that are P.M.-settled. The Exchange, therefore, may list micro-options on those same indexes pursuant to this pilot program, which pilot period currently expires on May 3, 2021 as well. As it will for the Nonstandard Expirations Pilot Program, to the extent the Exchange lists micro-options on the specified indexes pursuant to this P.M.-settlement pilot program, the Exchange will include the same information with respect to micro-options that it does for standard options in the reports it submits to the Commission in accordance with the pilot program.

Each micro-option will be on an index that already satisfies initial and maintenance listing criteria in Rule 4.10, and thus the underlying index of each micro-option consists of the same components as the underlying index of each standard index option. A micro-option will merely have $1/100^{th}$ the value of a standard option overlying the same index. Because micro-options and standard index options may overlie the same indexes, market participants may use micro-options as a hedging vehicle to meet their investment needs in connection with index-related products and cash positions in a similar manner as they do with standard index options, but as a more manageably sized

contract. The smaller-sized contract will also provide market participants with more precision to hedge their portfolios. Additionally, the smaller size makes a micro-option a lower cost option than a standard index option, making it a more affordable and lower risk investment choice for investors, particularly retail investors. Therefore, the Exchange believes it is appropriate to be able to list the same expirations and settlements for micro-options as it may for standard index options.[26]

Exercise Prices

The Exchange proposes to adopt Rule 4.13, Interpretation and Policy .01(l) to provide that, notwithstanding any other provision regarding strike price intervals in Rule 4.13, Interpretation and Policy .01, the interval between strike prices of series of micro-options will be $0.50 or greater. Because of the smaller contract size of micro-options, the Exchange believes it is appropriate to be able to list micro-options with smaller strike price intervals than standard index options.[27] The Exchange believes finer strike intervals will more closely align micro-options with their purpose of being a lower-cost investment tool to investors.[28] The Exchange believes that smaller strike intervals for micro-options will provide market participants with more efficient hedging and trading opportunities. The proposed $0.50 strike setting regime would permit strikes on a more

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[26] Initially, the Exchange anticipates listing series that it expects would appeal to retail investors – specifically, short-dated expirations.

[27] Pursuant to Rule 4.13, Interpretation and Policy .01, the interval between strike prices of standard index options is generally $5.00 except for lower-priced strikes, for which the smallest interval is $2.50, subject to certain exceptions (including reduced-value index options, which may have strike intervals of no less than $0.50 or $1).

[28] This is consistent with lower permissible strike intervals for certain reduced-value index options, which have the same practical effect as index options with a smaller multiplier. See id.

refined scale, which the Exchange believes will allow investors, particularly retail investors, to more affordably and efficiently gain exposure to equity markets, hedge their positions in instrument and cash positions in their portfolios, and more precisely tailor their investment strategies.

As demonstrated above, there are two important distinctions between micro-options and standard options due to the difference in multipliers, one of which is how the total deliverable value is calculated (the other is the meaning of bids and offers, as further discussed below). Proposed Rule 4.13, Interpretation and Policy .01(l) describes the difference between the meaning of the exercise price of micro-option and a standard index option. Specifically, the proposed rule change states that strike prices for micro-options are set at the same level as index options with an index multiplier of 100. For example, a micro-option call series with a strike price of 3250 has a total deliverable value of $3,250 (3250 x $1), while a standard option call series with a strike price of 3250 has a total deliverable value of $325,000 (3250 x $100).[29]

Minimum Increments

The Exchange proposes to amend Rule 5.4 to provide that a micro-option will have the same minimum increment for bids and offers as the minimum increment for a standard index option on the same index.[30] Similar to the proposed rule change above to

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[29] This corresponds to the calculation of exercise prices for other types of options with a reduced multiplier. For example, Rule 4.5, Interpretation and Policy .18(b) provides that strike prices for mini-options (which have multipliers of 10 rather than 100, as set forth in Rule 4.5, Interpretation and Policy .18(a)) are set at the same level as for standard options. For example, a call series strike price to deliver 10 shares of stock at $125 per share has a total deliverable value of $1,250 (10 x 125) if the strike is 125, while a call series strike price to deliver 100 shares of stock at $125 per share has a total deliverable value of $12,500 (100 x 125).

[30] See Rule 5.4(a). This corresponds to the provision regarding the minimum

describe the difference between the meaning of strike prices of micro-options and standard index options, the proposed rule change amends the Rules to describe the difference between the meaning of bids and offers for micro-options and standard index options. Specifically, proposed Rule 5.3(c)(2) provides that notwithstanding Rule 5.3(a),[31] bids and offers for a micro-option must be expressed in terms of dollars per 1/100th part of the total value of the contract. For example, an offer of "0.50" represents an offer of $0.50 for a micro-option.[32]

Appointment Weights

The Exchange proposes to add micro-options each as a Tier AA class with a Market-Maker appointment weight of .001.[33] This is the same appointment weight as a majority of the other Tier AA options classes. The Exchange determines appointment weights of Tier AA classes based on several factors, including, but not limited to, competitive forces and trading volume. The Exchange believes the proposed initial

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increment for mini-options.

31 Rule 5.3(a) states that except as otherwise provided in Rule 5.3, must be expressed in terms of dollar and decimals per unit of the underlying security or index. The Exchange believes that the proposed rule change is consistent with this provision, as a bid of 7 will represent a bid of 7 for an option contract having an index multiplier (*i.e.*, unit of trading) of one. However, the Exchange proposes to add a specific provision regarding the meaning of bids and offers for micro-options to provide complete clarity in the Rules, and to maintain consistency in the Rules, which currently contain a separate provision for mini-options, which as discussed above, have a reduced multiplier compared to standard options as micro-options do.

32 An offer of "0.50" represents an offer of $50 for a standard index option with an index multiplier of 100.

33 See Rule 5.50(g). While the appointment weights of Tier AA classes are not subject to quarterly rebalancing under Rule 5.50(g)(1), the Exchange regularly reviews the appointment weights of Tier AA classes to ensure that they continue to be appropriate. The Exchange determines appointment weights of Tier AA classes based on several factors, including, but not limited to, competitive forces and trading volume.

appointment weight of .001 for each micro-option will foster competition by incentivizing Market-Makers to obtain an appointment in these newly listed options and provide increased liquidity in a newly listed class, to the benefit of all investors.

Contract Size Limits

The proposed rule change updates various other provisions in the following Rules to reflect that one-hundred micro-contracts overlying an index will be economically equivalent to one contract for a standard index option overlying the same index:

- Rules 1.1 (definition of "complex order") and 5.65(d) (definition of "complex trade"): The definition of "complex order" in Rule 1.1 provides, among other things that for purposes of Rules 5.33 and 5.85(b)(1), the term "complex order" means a complex order with any ratio equal to or greater than one-to-three (.333) and less than or equal to three-to-one (3.00), an Index Combo order, a stock-option order, or a security future-option order.[34] Similarly, in Rule 5.65(d), the definition of "complex trade" (for purposes of the options linkage plan) means the execution of an order in an option series in conjunction with the execution of

[34] The proposed rule change also conforms the definition of "complex order" in Rule 1.1 to the definition of "complex trade" in Rule 5.65 to say that it may be comprised of different series in the same "underlying security" rather than the same "class." As discussed above, micro-options will be a different class than standard index options overlying the same index. This accommodates, for example, the fact that a complex order could be comprised of mini-options and standard options overlying the same stock (as contemplated by the current definition) despite being in different classes. The proposed rule change also expands the definitions of complex order in Rule 1.1 and complex trade in Rule 5.65 to provide that it may similarly be comprised of different series in the same "underlying index." The Exchange notes that full-value indexes and reduced-value indexes are separate indexes under the Exchange Rules, so to the extent a multi-legged order whose legs overly different indexes (such as one leg with a full-value index and one leg with a reduced-value index) would not qualify for the definition of "complex trade."

one or more related order(s) in different option series in the same underlying security occurring at or near the same time in a ratio that is equal to or greater than one-to- three (.333) and less than or equal to three-to-one (3.0) and for the purpose of executing a particular investment strategy (for the purpose of applying the aforementioned ratios to complex trades comprised of both mini-option contracts and standard option contracts, ten (10) mini-option contracts will represent one (1) standard option contract. The proposed rule change adds to the definition in each of Rules 1.1 and 5.65(d) that for the purposes of applying these ratios to complex orders comprised of legs for both micro-options and standard options, 100 micro-option contracts represent one standard option contract.[35]

While retail investors generally do not submit highly complicated complex orders with many legs, certain simple complex orders, such as straddles, are common among retail investors. These strategies can provide retail investors with additional certainty with respect to the outcomes of their options investments and hedging opportunities. For example, consider an investor looking to hedge an upward move in the U.S. equities market, and assume the level of SPESG is 400. Rather than purchase a call with a 400 strike and expiration in one day at $1.75, he could enter into a call spread to buy a call with a 400 strike (with a $1.75 premium) and sell a call with a 403 strike (with a $0.75 premium), each with an expiration in one day, for a total cost of $1. While this simple strategy caps the potential payout of the investment to $3 (the difference between the strikes), it

[35] This corresponds to the provision in those definitions regarding mini-options, which states that for the purpose of applying these ratios to complex orders comprised of legs for both mini-options and standard options, ten mini-option contracts represent one standard option contract.

also reduces the total premium by approximately 43% ($1 compared to $1.75) and caps the maximum loss to the $1 investment.

Suppose instead this investor sought to hedge a market move but was unsure of in which direction it would move. This investor could invest in a straddle, purchase one call with a 400 strike (for $1.75) and one put with a 400 strike (for $1.75) for a total premium of $3.50. If the market moves by more than 3.50 in either direction (which would be a move of less than 1%), this investment will give the investor a positive return, with a maximum loss of $3.50. Currently, for an investor to invest in a similar strategy, the cost (and maximum loss) would be $350 rather than $3.50, a much more significant portion of a retail investor's account.

- Rules 5.37 and 5.38: Rules 5.37 and 5.38 describe the Exchange's Automated Improvement Mechanism for simple ("AIM") and complex orders ("C-AIM"), respectively. There is no minimum size for an order submitted into an AIM or C-AIM Auction.[36] However, in an AIM Auction for orders less than 50 standard option contracts (or 500 mini-option contracts), the stop price must be at least one minimum increment better than the then-current national best-bid or offer or the order's limit price (if the order is a limit price), whichever is better. For orders of 50 standard option contracts (or 500 mini-option contracts) or more, the stop price must be at or better than the then-current national best-bid or offer

[36] The Exchange notes in SPX during Regular Trading Hours, there is a maximum size of 10 contracts for order submitted into AIM and C-AIM Auctions (in C-AIM, the maximum size is based on the smallest leg of the complex order).

or the order's limit price (if the order is a limit price), whichever is better.[37] The proposed rule change adds to Rule 5.37(b) that 5,000 micro-option contracts is the corresponding size for these stop price restrictions. Additionally, Rule 5.37(c) and 5.38(c) provide that no concurrent AIM or C-AIM Auctions, respectively, are permitted for orders less than 50 standard option contracts (or 500 mini-option contracts) (for C-AIM Auctions, the size is determined by the smallest leg of the complex order), but are permitted for orders of 50 standard option contracts (or 500 mini-option contracts) or greater (for C-AIM Auctions, the size is determined by the smallest leg of the complex order). The proposed rule change adds that 5,000 micro-option contracts is the corresponding size for determining whether concurrent auctions are permissible.

- Rules 5.39 and 5.40: Rules 5.39 and 5.40 describe the Exchange's Solicitation Auction Mechanism for simple ("SAM") and complex ("C-SAM"), orders, respectively. An order, or the smallest leg of a complex order, must be for at least the minimum size designated by the Exchange (which may not be less than 500 standard option contracts or 5,000 mini-option contracts). The proposed rule change adds that 50,000 micro-option contracts is the corresponding minimum size for orders submitted into SAM or C-SAM Auctions.

- Rule 5.87: Rule 5.87(f) describes when a Floor Broker is entitled to cross a certain percentage of an order, subject to the requirements in that paragraph. Under that Rule, the Exchange may determine on a class-by-class basis the eligible size for an order that may be transacted pursuant to this paragraph;

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37 See Rules 5.37(b).

however, the eligible order size may not be less than 50 standard option contracts (or 500 mini-option contracts). The proposed rule change adds that 5,000 micro-option contracts is the corresponding minimum size for orders that may be crossed in accordance with this provision. Additionally, Rule 5.87, Interpretation and Policy .07(a) provides that Rule 5.86(e)[38] does not prohibit a Trading Permit Holder ("TPH") from buying or selling a stock, security futures or futures position following receipt of an order, including an option order, but prior to announcing such order to the trading crowd, provided that the option order is in a class designated as eligible for "tied hedge" transactions and within the eligibility size parameters, which are determined by the Exchange and may not be smaller than 500 standard option contracts (or 5,000 mini-option contracts). The proposed rule change adds that 50,000 micro-option contracts is the corresponding minimum size for orders that may qualify as tied hedge transactions and not be deemed a violation of Rule 5.86(e).

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38 Rule 5.86(e) provides that it will be considered conduct inconsistent with just and equitable principles of trade for any TPH or person associated with a TPH, who has knowledge of all material terms and conditions of an original order and a solicited order, including a facilitation order, that matches the original order's limit, the execution of which are imminent, to enter, based on such knowledge, an order to buy or sell an option of the same class as an option that is the subject of the original order, or an order to buy or sell the security underlying such class, or an order to buy or sell any related instrument until either (1) all the terms and conditions of the original order and any changes in the terms and conditions of the original order of which that Trading Permit Holder or associated person has knowledge are disclosed to the trading crowd or (2) the solicited trade can no longer reasonably be considered imminent in view of the passage of time since the solicitation. An order to buy or sell a "related instrument," means, in reference to an index option, an order to buy or sell securities comprising ten percent or more of the component securities in the index or an order to buy or sell a futures contract on any economically equivalent index.

Position and Exercise Limits[39]

Rule 8.31 governs position limits for broad-based index options, and currently provides that there are no position limits for broad-based index option contracts (including reduced-value option contracts) on DJX, OEX, XEO, RUT, and SPX classes (among others). With respect to the other broad-based index options that the Exchange currently lists for trading, the Exchange fixes the position limits, which may not be larger than the limits in the following table:

Broad-Based Index	Standard Limit (on the same side of the market)
Russell 1000 Russell 1000 Growth Russell 1000 Value	50,000 contracts (no more than 30,000 near-term)
MSCI Emerging Markets Index MSCI EAFE Index	50,000 contracts
Other	25,000 contracts (no more than 15,000 near-term)

The proposed rule change adds Rule 8.31(f) to provide that positions in micro-options (with an index multiplier of one) will be aggregated with positions in standard options (including reduced-value option contracts) (with an index multiplier of 100) on the same broad-based index and, for purposes of determining compliance with the position limits under Rule 8.31, 100 micro-option contracts with an index multiplier of one equal one standard option contract with an index multiplier of 100. This is consistent with Rule

[39] This discussion focuses on position and exercise limits with respect to indexes on which the Exchange currently lists standard options and may also list micro-options. To the extent the Exchange lists micro-options on other indexes in the future, they would be subject to the same position and exercise limits set forth in the applicable Rules, and similarly aggregated with standard options on the same indexes, as proposed.

8.31(d), which similarly provides that positions in reduced-value index options are aggregated with positions in full-value index options based on economic equivalent values of those options.[40]

Rule 8.42(b) governs exercise limits for index options and provides that exercise limits for index option contracts will be equivalent to the position limits prescribed for option contracts with the nearest expiration date in Rule 8.31, 8.32, or 8.34. As is the case for certain broad-based index options as noted above, there are no exercise limits for certain broad-based index options (including reduced-value option contracts). The proposed rule change adds to Rule 8.42(b) that there will similarly be no exercise limits on micro-option contracts on those same broad-based indexes.

Capacity

The Exchange has analyzed its capacity and represents that it believes the Exchange and Options Price Reporting Authority ("OPRA") have the necessary systems capacity to handle the additional traffic associated with the listing of new series that may result from the introduction of the micro-options. Because the proposed rule change is limited to broad-based index options overlying indexes with a value of at least 100, which currently represent only 11 (and soon to be 12) of the option classes listed on the Exchange, the Exchange believes any additional traffic that may be generated from the introduction of micro-options will be manageable. The Exchange also understands that the OCC will be able to accommodate the listing and trading of micro-options.

Regulation

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40 As noted above, an index option with a reduced multiplier has the same practical effect as an index option on a reduced-value index. A micro-option is the economic equivalent to a reduced-value index that is 1/100th of the full-value index.

The Exchange notes TPHs that enter micro-option orders on behalf of customers, including retail customers, will continue to be subject to all Exchange Rules regarding doing business with the public, including those within Chapter 9 of the Rulebook. A TPH may not accept an option order, including a micro-option order, from a customer unless that customer's account has been approved for options transactions in accordance with Rule 9.1.[41] TPHs that conduct customer business, including retail customer business must ensure they provide for appropriate supervisory control over that business and maintain customer records in accordance with Rule 9.2. TPHs that do business with the public will need to provide customers that trade micro-options (and any other option) with a copy of the ODD and amendments to the ODD in accordance with Rule 9.9 so that customers are informed of any risks associated with trading options, including micro-options.

2. Statutory Basis

The Exchange believes the proposed rule change is consistent with the Securities Exchange Act of 1934 (the "Act") and the rules and regulations thereunder applicable to the Exchange and, in particular, the requirements of Section 6(b) of the Act.[42] Specifically, the Exchange believes the proposed rule change is consistent with the Section 6(b)(5)[43] requirements that the rules of an exchange be designed to prevent fraudulent and manipulative acts and practices, to promote just and equitable principles of trade, to foster cooperation and coordination with persons engaged in regulating,

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41 This includes providing any customers approved for writing uncovered short options transactions with a written description of the risks inherent in writing uncovered short option transactions. See Rule 9.1(f)(5).

42 15 U.S.C. 78f(b).

43 15 U.S.C. 78f(b)(5).

clearing, settling, processing information with respect to, and facilitating transactions in securities, to remove impediments to and perfect the mechanism of a free and open market and a national market system, and, in general, to protect investors and the public interest. Additionally, the Exchange believes the proposed rule change is consistent with the Section 6(b)(5)[44] requirement that the rules of an exchange not be designed to permit unfair discrimination between customers, issuers, brokers, or dealers.

In particular, the Exchange believes the proposed rule change will remove impediments to and perfect the mechanism of a free and open market and a national market system, and, in general, protect investors and the public interest. The Exchange believes the proposed rule change will expand investor choice and flexibility by providing investors with the ability to gain exposure to the U.S. equities markets using index options with a notional value of 1/100th of the value of current index options. The Exchange believes there is unmet market demand from market participants for micro-options. The availability of micro-options may broaden the base of investors that use options to manage their trading and investment risk, as the Exchange believes they will appeal to retail investors who currently may not participate in the trading of index options. Due to the larger-value of indexes (which generally result in options with five and six figure notional values, as demonstrated above) and corresponding high options premiums, the Exchange believes that investors, most notably average retail investors, would benefit from the availability of micro-options. Micro-options would make currently high-priced options more readily available as an investing tool at more affordable and realistic prices, thus reducing associated investment risk. Micro-options

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44 Id.

will make available to investors a relatively low-cost method to hedge or speculate on market risk and meet their investment needs associated with index options. The lower cost of micro-options will allow investors to trade index options and hedge their portfolios with a smaller outlay of capital, and thus with less investment risk. This may facilitate overall investor participation in the markets for index options, which may increase the depth and liquidity of these markets, to the benefit of all investors.

The Exchange believes the ability to list micro-options is consistent with several current rules. Particularly, the underlying indexes on which micro-options would be listed satisfied the initial listing standards for index in the Exchange's current Rules and would need to continue to satisfy the maintenance listing criteria in the Rules.[45] Pursuant to the definition of index multiplier[46] in Rule 4.11, the Exchange may determine the index multiplier of an option, which it generally does in the specifications for an index option.[47] Similarly, Article I, Section 1, I(3) of the OCC By-Laws defines "index multiplier" as the dollar amount (as specified by the Exchange on which such contract is traded) by which the current index value is to be multiplied to obtain the aggregate current index value. Unlike the definition of a unit of trading in the OCC By-Laws, which states the unit of trading in is designated by OCC but is 100 shares if not otherwise specified, the definition of index multiplier includes no such default.[48] Therefore, the

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45 See Rule 4.10.

46 Rule 4.11 defines the term "index multiplier" as the amount specified in the contract by which the current index value is to be multiplied to arrive at the value required to be delivered to the holder of a call or by the holder of a put upon valid exercise of the contract.

47 Option specifications are available on the Exchange's public website, *available at* cboe.com/tradable_products/.

48 See OCC Bylaws Article I, Section 1, U(5).

Exchange believes the current index multiplier definition in the OCC By-Laws (which would have previously been filed with the Commission) permits any index multiplier specified by the listing Exchange given the lack of a default index multiplier for index options (and the inclusion of a default unit of trading for equity options). This is consistent with the lack of default number in Exchange's definition of index multiplier and the ability for the Exchange to specify the index multiplier, as noted above. Additionally, the Exchange believes any potential risks of index options with a multiplier of one are covered by disclosures of the ODD, as it considers the possibility of differing values of index multipliers.[49] However, certain other Rules reflect an index multiplier of 100, and the proposed rule change updates those Rules to reflect the potential listing of an index option with an index multiplier of one.

The listing of micro-options has the same practical effect as the listing of reduced-index value options, which the Exchange (and other options exchanges) currently has the authority to do with respect to several indexes (in accordance with previously Commission-approved rules). For example, the Exchange may list options on both the S&P 500 Index (SPX options) and the Mini-S&P 500 Index (XSP options), which is 1/10th the value of the S&P 500 Index.[50] This is economically equivalent to if the

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49 The ODD is available at https://www.theocc.com/about/publications/character-risks.jsp. The ODD states that the exercise price of a stock option is multiplied by the number of shares underlying the option to determine the aggregate exercise price and aggregate premium of that option. See ODD at 18. Similarly, the ODD states that the total exercise price for an index option is the exercise price multiplied by the multiplier, and the aggregate premium is the premium multiplied by the multiplier. See ODD at 8, 9, and 125.

50 The Exchange notes if it desired to list a reduced-value index option on other indexes, or list an option on a micro-level index (i.e., an index with 1/100th the value of the full-sized index), it could do so without Commission approval if the underlying index satisfied the generic listing criteria in Rule 4.12.

Exchange listed an S&P 500 Index option with an index multiplier of 100 and with an index multiplier of 10, respectively. The proposed rule change will permit the Exchange to make reduced-value options on all indexes available without relying on a reporting authority to create and disseminate a reduced-value index at a reduced-value level that the Exchange believes may be beneficial to the marketplace. The Commission also previously approved a proposed rule change of at least one other options exchange to list reduced-value options on a "micro-index"(which has 1/100th the value of the full index) as well as the full-value index and "mini-index" (which has 1/10th the value of the full index).[51] Similarly, designated contract markets also list index futures (with which the Exchange's options contracts compete) with varying multipliers. For example, the Chicago Mercantile Exchange currently lists standard, mini-, and micro- futures on the S&P 500 Index, the Russell 2000, and the DJIA with multipliers of $250, $50 and $5 (which is 1/50th the size of the full-size future), respectively.[52] Therefore, the Exchange believes the availability of micro-options will increase investor choice and promote competition in the listed derivatives markets.

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51 See, e.g., Securities Exchange Act Release No. 53484 (March 14, 2006), 71 FR 14268 (March 21, 2006) (SR-ISE-2005-25) (order approving proposed change to permit International Securities Exchange ("ISE") to list and trade options on the FTSE 100 Index and FTSE 250 Index based on the full-value of the indexes, one-tenth of the value of the indexes, and one-hundredth of the value of the indexes.

52 See CME contract specifications, *available at* https://www.cmegroup.com/trading/equity-index/us-index/e-mini-sandp500_contract_specifications.html. In addition to these indexes, CME also lists index futures with multipliers of $250 and $50 on several other indexes on which the Exchange also lists index options (and on which the Exchange would be able to list micro-options pursuant to the proposed rule change), including the FTSE Developed Europe Index, the FTSE Emerging Markets Index, the Russell 1000 Index, the Russell 1000 Growth Index, and the Russell 1000 Value Index.

As described above, the proposal contains features designed to protect investors by reducing investor confusion. For example, micro-options will be designated by different trading symbols from their related standard contracts. Additionally, the proposed rule change describes in the Rules the differences regarding the meanings of bids and offers, exercise prices (and thus deliverables), and minimum sizes of index options contracts with a multiplier of one and a multiplier of 100, all of which are adjusted proportionately to reflect the difference in multiplier, and thus the difference in the deliverable value of the underlying.[53] The Exchange believes the transparency and clarity the proposed rule change adds to the Rules regarding the distinctions between index options due to the different multipliers will benefit investors. These proposed changes are not novel, as they correspond to similar rule provisions regarding other reduced-value options.[54]

When the Exchange became the first listed options exchange in 1973, we recognized the importance and commitment to education. In 1985, this commitment was formalized with the creation of the Options Institute, the Exchange's education arm. The Options Institutes' mission was, and remains focused on, increasing the understanding of derivatives products and the risk-appropriate use of these financial instruments. The Exchange (and the Options Institute) believe transparency is critical to a fair and orderly market.[55] As we continue to evolve our products and expand access to the marketplace,

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53 These proposed changes correspond to similar provisions for mini-options, which also have a smaller multiplier than standard-sized options.

54 See, e.g., Rules 4.5, Interpretation and Policy .18 (description of strike prices for mini-options, which have a multiplier of 10) and 5.3(c) (description of bids and offers for mini-options).

55 This includes directing investors to the ODD, which is public available and describes risks of all types of options.

we in parallel, continue to take steps forward in our educational offerings. We believe the introduction of micro-options will appeal to retail investors and retail brokers. The Exchange believes it has a responsibility to provide education to the public and investor segment about micro-options (including the contract specifications, features, risks, and benefits of the product), as well as the role of an exchange, market structure, the life-cycle of a trade, and derivatives products benefits, uses, and risks. We plan to deliver our education offering using our existing channels and through expanded on-demand, web-based content. In accordance with our responsibility to educate, the Exchange regularly reviews its education content and intends to expand and enhance it as appropriate after the launch of micro-options.

Other than these differences, micro-options will trade in the same manner as index options. Each micro-option will be on an index consisting of the same components as the underlying index of standard index options that may currently be listed on the Exchange, but with 1/100th the value of those indexes. Because micro-options and standard index options overlie the same indexes, market participants may use micro-options as hedging vehicles to meet their investment needs in connection with index-related products and cash positions in a similar manner as they do with standard index options, but as a more manageably sized contract. The smaller-sized contract may provide market participants with more precision with respect to hedging their portfolios. Additionally, the smaller size makes micro-options a lower cost option, making it a more affordable and lower risk option for investors, particularly retail investors. Therefore, the Exchange believes it is reasonable and appropriate to be able to list the same expirations and settlements for micro-options as it may for standard index options.

The Exchange believes the proposed rule change for the minimum price increment for micro-options to be the same as the minimum price increment for index options overlying the same index will benefit investors, as it may lessen investor and marketplace confusion. While price protection between micro-options and standard options on the same index is not required, the Exchange believes that consistency between micro-options and standard options as to the minimum price variation is desirable and is designed to promote just and equitable principles of trade. Matching the minimum price increment between micro-options and standard options on the same index would help to eliminate any unnecessary arbitrage opportunities that could result from having contracts on the same underlying index traded in different minimum price increments. Similarly, the Exchange believes matched minimum pricing may generate enhanced competition among liquidity providers. The Exchange believes that matched pricing for micro-options and standard options on the same index would attract additional liquidity providers who would make markets in micro-options and standard options on the same index. In addition to the possibility of more liquidity providers, the Exchange believes that the ability to quote micro-options and standard options on the same index in the same minimum increments would hopefully result in more efficient pricing via arbitrage and possible price improvement in both contracts on the same index. Finally, having the same minimum increment for micro-options and standard options would be beneficial from a logistical perspective since firms' existing systems are generally configured using the "root symbol" of an underlying index, and it may be difficult and resource-intensive for firms to assign different minimum pricing to micro-options and standard options on the same index.

The Exchange believes the proposed rule change regarding the treatment of micro-options with respect to determining compliance with position and exercise limits is designed to prevent fraudulent and manipulative acts and practices and promote just and equitable principles of trade. Index options with a multiplier of one will be counted for purposes of those limits in a proportional manner to index options (including reduced-value indexes) with a multiplier of 100 and aggregated with options overlying the same index (including reduced-value indexes) in the same manner as index options currently are. This is equivalent to current limits imposed on reduced-value options. As noted above, while the multipliers of reduced-value indexes are $100, a reduced-value index option has an economically equivalent effect to an index option with a smaller multiplier. An index option with a multiplier of one corresponds to an option overlying a reduced-valued index that is 1/100th the value of the full-value index. It just uses a different multiplier rather than a different value of the underlying index.[56] The Exchange believes its surveillances continue to be designed to deter and detect violations of Exchange Rules, including position and exercise limits and possible manipulative behavior, and those surveillance will apply to index options with a multiplier of one that the Exchange determines to list for trading. Ultimately, the Exchange does not believe that this proposed rule change raises any unique regulatory concerns because existing safeguards — such as position and exercise limits (and the aggregation of options overlying the same index (including reduced-value indexes)) and reporting requirements — would continue to apply.

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[56] This is also similar to position limits for other options with multipliers less than 100. See, e.g., Rule 8.30, Interpretation and Policy .08 (describing position limits for mini-options).

The Exchange also believes the proposed initial low appointment weight for micro-options will promote competition and efficiency by incentivizing more Market-Makers to obtain an appointment in each micro-option the Exchange lists. The Exchange believes this may result in liquidity and competitive pricing in this class, which ultimately benefits investors. The Exchange does not believe that the proposed rule change is unfairly discriminatory, as the appointment weight will apply to all Market-Makers in the class. Additionally, the proposed appointment weight is the same as the appointment weight for a majority of other Tier AA options classes, as well as a recently listed index option classes to likewise promote Market-Maker appointment, liquidity and competitive

The Exchange represents that it has the necessary systems capacity to support the new option series given these proposed specifications. The Exchange believes that its existing surveillance and reporting safeguards are designed to deter and detect possible manipulative behavior which might arise from listing and trading micro-options. The Exchange further notes that current Exchange Rules that apply to the trading of other index options traded on the Exchange will also apply to the trading of micro-options, such as Exchange Rules governing customer accounts, margin requirements and trading halt procedures. The Exchange understands that market participants may currently, and currently do, execute orders in options like the ones being proposed in the unregulated OTC options market, where neither the Exchange nor the Commission has oversight over market participants that may be purposely trading at prices through the listed market. As discussed below, the proposed rule change may encourage these orders to be submitted to the Exchange, which could bring these orders into a regulated market and be subject to

surveillance and oversight to which they are currently not subject with respect to execution of these option orders.

The Exchange does not believe the proposed rule change raises any price protection concerns due to the possibility of having economically equivalent options overlying the same index listed with different multipliers. This possibility exists today with respect to indexes on which the Exchange may list full- and reduced-value index options (subject to any applicable regulatory requirements) as well as economically equivalent index and ETF options. Some reduced-value indexes are 1/10th the value of the full-value index, while others are 1/100th the value of the full-value-index. For indexes on which the Exchange may currently list full- and reduced-value options, while the index multipliers of reduced-value indexes are 100, the reduced value has a similar effect as a smaller multiplier. Ultimately, while these options may be economically equivalent, they are different products, and market participants price them to incorporate not only the economic and notional value, but also trading costs, which may differ for each product. The Exchange has observed no trading activity that raises concerns that market participants may be trading in one product as a reason to trade-through the market of an economically equivalent product.

While the Exchange may ultimately list micro-options that are economically equivalent to index options with a 100 multiplier, the Exchange similarly has no concerns that this will lead to such behavior. The Exchange expects that Market-Makers with appointments in index options may seek appointment in micro-options overlying the same indexes. As noted above, the Exchange understands the systems Market-Makers use to price the quotes they stream in their appointed classes (which quotes generally set market

prices for series in these classes) use the same tools and methodologies to determine theoretical values for options overlying the same index. For example, a Market-Maker prices its quotes for SPX and XSP in the same manner, while incorporating factors that distinguish the products (for example, the smaller index value of XSP and differing costs to trade each product). As a result, the Exchange believes there is consistency in pricing across the markets of economically equivalent products, as it would be unlikely for a Market-Maker, for example, to pay more for an XSP option than it would for an equivalent SPX option (excluding the impact of differing trading costs). Therefore, Market-Makers that quote in index options on the Exchange today would be able to price quotes in micro-options using the same tools, updated to similarly incorporate the applicable differences between micro-options and the index options with a multiplier of 100 overlying the same index, and as a result expects consistent pricing across these markets. The Exchange believes this minimizes any price protection concerns related to the listing of micro-options.

Additionally, the Exchange has observed no fragmentation of liquidity in the markets for economically equivalent products that are listed today, nor does it believe the proposed rule change will result in any fragmentation of liquidity due to the listing of economically equivalent products. As noted above, the Exchange expects micro-options to generate new order flow to the Exchange, particularly from retail investors. Additionally, because Market-Makers have systems in place to price options overlying the same index, the Exchange understands Market-Makers would be able to price micro-options using their current systems with moderate updates to incorporate trading costs and other relevant differences. And because of the small notional value of micro-options,

the Exchange believes quoting in micro-options would not have a significant impact on the risk Market-Makers must take on or on their capital requirements as a result of such quoting. Ultimately, Market-Makers generally "follow the order flow" and stream quotes in series in which there is more order flow (and thus more demand). Therefore, if there is new order flow in micro-options, the Exchange expects Market-Makers would seek to quote in those options and compete for that order flow.[57]

The Exchange does not anticipate market participants diverting their current order flow from index options with 100 multipliers to micro-options. First, as discussed above, the Exchange believes micro-options will be a point of entry for investors that may currently be priced out of index options due to their high notional value and corresponding high options premiums. As a result, the Exchange believes micro-options will create new customer order flow on the Exchange. Second, it may not make financial sense for market participants to move order floor from an index option with a 100 multiplier to a micro-option if the market participant intends to trade more than one index option with a 100 multiplier. This is because one index option contract is equivalent to 100 micro-option contracts. In addition to transaction fees charged by the Exchange (which are charged per contract),[58] other fees applicable to options transactions are often

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[57] Ultimately, when it comes to customer order flow against which Market-Makers' quotes can execute, as those immortal words say, "if you build it, [they] will come." See *Field of Dreams*, (1989) [film]. Directed by P. Robinson; see also https://www.youtube.com/watch?v=o3c_pJ_CLJQ.

[58] While the Exchange has not yet determined transaction fees to be charged for micro-options, we expect to price micro-options in a similar manner as we do other reduced-value index options. Specifically, we generally adopt prices for reduced-value index options that are approximately proportional to the full-value index options. See Cboe Fees Schedule. For example, we recently adopt MRUT transaction fees, which were approximately 1/10th the transaction fees for RUT options (as the Mini-Russell 2000 Index is 1/10th the size of the Russell 2000

charged on a per contract basis. For example, the OCC charges $0.045 per contract for trades with contracts up to 1,222. Therefore, to clear a trade of one index option with a 100 multiplier, OCC would charge $0.045. However, to clear 100 micro-options, OCC would charge $4.50. In addition to the fees charged by OCC, the Exchange understands that clearing firms generally charge on a per contract basis, as do many brokers. Therefore, it would make little financial sense for a market participant to trade 100 times the number of contracts in the micro-option market if it can trade one economically equivalent contract in the index option with a 100 multiplier.

Theoretically, the only market participants the Exchange expects would consider moving volume from current index options to micro-options are those that trade one lots, because they want access to index options but in the current smallest amount possible (i.e. one contract). Additionally, the Exchange believes retail investors generally trade shorter-term options, and thus the Exchange believes the only potential one lots that would move to the micro-option market would be those in series with no more than seven days until expiration. In 2020, of total volume in six index options that trade on Cboe and its affiliated options exchange, approximately 0.3% consisted of one lot orders in options with no more than seven days until expiration (in no class was this percentage more than 0.5%), and approximately 1.1% consisted of one lot orders in options with any expiration (in no class was this percentage more than 2.1%). Similarly, in 2020, of total volume in corresponding ETF options executed on Cboe and its affiliated options, approximately 1%

Index). See Securities Exchange Act Release No. 91288 (March 10, 2021) (SR-CBOE-2021-015). The Exchange notes while its transaction fees for micro-options will be approximately proportional to the transaction fees for standard-sized options, the Exchange has no control over other fees that may apply to option trading (including brokerage and clearing fees).

consisted of one lot orders in options with no more than seven days until expiration (in no class was this percentage more than 1.6%), and approximately 2.4% consisted of one lot orders in options with any expiration (in no class was this percentage more than 2.7%). While the Exchange expects little, if any, of this volume to move to micro-options (because the Exchange believes they will appeal to investors not currently trading index options), even if all of this volume moved to the micro-options market, it represents a very small portion of volume in these options. Therefore, significant order flow would remain in index options and ETF options that track index options with 100 multipliers, and as a result, Market-Makers would continue to quote in these products and compete for that volume. As discussed above, rather than cause market participants to change their order flow from currently listed options, the Exchange believes the proposed rule change will draw new volume to the Exchange and, thus, will not cause any market fragmentation.

A robust and competitive market requires that exchanges respond to investors' evolving needs by constantly improving their offerings. When Congress charged the Commission with supervising the development of a "national market system" for securities, Congress stated its intent that the "national market system evolve through the interplay of competitive forces as unnecessary regulatory restrictions are removed.[59] Consistent with this purpose, Congress and the Commission have repeatedly stated their preference for competition, rather than regulatory intervention to determine products and services in the securities markets.[60] This consistent and considered judgment of

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59 See H.R. Rep. No. 94-229, at 92 (1975) (Conf. Rep.).

60 See S. Rep. No. 94-75, 94th Cong., 1st Sess. 8 (1975) ("The objective [in enacting the 1975 amendments to the Exchange Act] would be to enhance competition and to allow economic forces, interacting within a fair regulatory field, to arrive at appropriate variations in practices and services."); Order Approving Proposed

Congress and the Commission is correct, particularly in light of evidence of robust competition in the options trading industry. The fact that an exchange proposed something new is a reason to be receptive, not skeptical — innovation is the life-blood of a vibrant competitive market — and that is particularly so given the continued internalization of the securities markets, as exchanges continue to implement new products and services to compete not only in the United States but throughout the world. Options exchanges continuously adopt new and different products and trading services in response to industry demands in order to attract order flow and liquidity to increase their trading volume. This competition has led to a growth in investment choices, which ultimately benefits the marketplace and the public. The Exchange believes that the proposed rule change will help further competition by providing market participants with yet another investment option for the listed options market.

B. Self-Regulatory Organization's Statement on Burden on Competition

The Exchange does not believe that the proposed rule change will impose any burden on competition that is not necessary or appropriate in furtherance of the purposes of the Act. The Exchange does not believe that the proposed rule change will impose any burden on intramarket competition that is not necessary or appropriate in furtherance of the purposes of the Act as any micro-options the Exchange lists for trading will be

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Rule Change Relating to NYSE Arca Data, Securities Exchange Act Release No. 59039 (December 2, 2008), 73 FR 74770 (December 9, 2008) ("The Exchange Act and its legislative history strongly support the Commission's reliance on competition, whenever possible, in meeting its regulatory responsibilities for overseeing the [self-regulatory organizations] and the national market system. Indeed, competition among multiple markets and market participants trading the same products is the hallmark of the national market system."); and Regulation NMS, 70 FR at 37499 (observing that NMS regulation "has been remarkably successful in promoting market competition in [the] forms that are most important to investors and listed companies").

available for all market participants in the same manner who wish to trade such options. The Exchange may list micro-options on all indexes currently authorized to be listed on the Exchange, subject to the same listing criteria. These options will trade in the same manner as index options with a multiplier of 100, with certain terms proportionately adjusted to reflect the different contract multipliers. Additionally, the Exchange believes that the proposed rule change will enhance competition by allowing products on the same index to be priced in the same minimum price increments. The Exchange also believes the proposed initial low Market-Maker appointment cost for micro-options will apply equally to all Market-Makers with an appointment in micro-options and will promote competition by incentivizing more Market-Makers to obtain an appointment in the newly listed class, resulting in liquidity and competitive pricing within the class.

The Exchange also believes limiting the filing to broad-based index options is reasonable, as broad-based index options will provide retail investors with access to products they can use to gain efficient exposure to the U.S. equity market and execute risk management and hedging strategies for their entire portfolio in a more economical manner (rather than trying to hedge positions for each security). For example, if a retail investor has positions in 20 different stocks, rather than protect against downside moves by buying a put for each underlying (i.e., 20 options),[61] the investor could instead buy a single put for a broad-based index option and cover the risk of that entire portfolio with a single option for which the maximum loss is known (i.e., the price of the premium paid for the option). In other words, index options can provide retail investors with a risk

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[61] An investor's purchase of multiple options (compared to a single option) could significantly increase the investor's overall execution cost, risk, and complexity associated with trying to create a hedge. The purchase of a single option could, therefore, reduce these execution burdens on the investor.

management tool to hedge against a downturn in the U.S. equities market while they retain positions in securities the prices of which the investors believe may continue to rise.[62] Additionally, exposure to broad-based index options may be less risky for short-term investments (which are common among retail investors) than exposure to single-stock options. Broad-based indexes generally have much lower long-term realized and implied volatility (and thus less risk) compared to equities. This lower volatility combined with the breadth and depth of the market liquidity makes options on broad-based indexes less risky than equity options, for which the volatility and risk can be 10 to 30 times greater than broad-based index options. As noted above, the one multiplier reduces the premium level for index options. Currently, for a retail investor to trade at a $5 to $10 premium level, which is consistent with a smaller $1,000 to $5,000 account's trading size, that investor would need to invest in extremely far out-of-the-money index options. More commonly, retail investors instead are forced to trade options on low-priced single-stock equity options. By offering a $5 to $10 price point for broad-based index options, micro-options will provide retail investors with a less risky hedging vehicle. The Exchange believes a lower premium micro-option will provide retail investors with a more compelling alternative to purchases of ETFs (or options on ETFs) for investors seeking exposure to broad market moves. For example, a $3 XSP call option can lose only the $3 premium spent, whereas a long position a SPY option can lose a significantly higher premium. On average, more than 100,000 one lot SPY options

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[62] The Exchange also believes it is reasonable to limit micro-options to broad-based indexes with values of at least 100, as indexes with smaller values would have smaller notional values and thus create less of a barrier to entry for retail investors. Therefore, the Exchange believes demand for a smaller multiplier for smaller-valued indexes would be minimal at this time.

with an expiration of fewer than seven days trades daily. Recently, the average premium of these options was approximately $165, which would be the maximum loss for investors that purchase any such options. The Exchange believes, based on this information, there are market participants that would prefer a lower premium level to achieve this market exposure that micro-options can provide. In other words, a one multiplier is a cleaner way to "fractionate" options liquidity to provide access to smaller accounts. Therefore, the Exchange believes micro-options could reduce retail reliance on higher volatility products by reducing the price access point of index options, which currently may be driving retail participation to single stocks and derivatives on those stocks.

The Exchange does not believe the proposed rule change will impose any burden on intermarket competition that is not necessary or appropriate in furtherance of the purposes of the Act because micro-options may only be listed for trading on the Exchange. To the extent that the availability of these products makes the Exchange a more attractive marketplace to market participants at other exchanges, market participants are free to elect to become market participants on the Exchange. As noted above, other derivative products related to these indexes are listed for trading on other exchanges. Additionally, the Exchange notes that listing and trading micro-options on the Exchange will subject such options to transparent exchange-based rules as well as price discovery and liquidity, as opposed to alternatively trading these products in the OTC market. As discussed above, the Exchange does not believe the proposed rule change will result in any fragmentation of the market.

The Exchange believes that the proposed rule change may relieve any burden on, or otherwise promote, competition. The proposal is designed to increase competition for order flow on the Exchange in a manner that is beneficial to investors by providing them with a lower-cost option to hedge their investment portfolios and to remove a potential barrier to entry into the index option market for retail investors. The Exchange notes that it operates in a highly competitive market in which market participants can readily direct order flow to competing venues who offer similar products. The Exchange believes the proposed rule change encourages competition amongst market participants to provide lower-priced (and thus lower risk) and more granular option products, which may appeal to all market participants, including retail investors.

C. Self-Regulatory Organization's Statement on Comments on the Proposed Rule Change Received from Members, Participants, or Others

The Exchange neither solicited nor received comments on the proposed rule change.

III. Date of Effectiveness of the Proposed Rule Change and Timing for Commission Action

Within 45 days of the date of publication of this notice in the Federal Register or within such longer period up to 90 days (i) as the Commission may designate if it finds such longer period to be appropriate and publishes its reasons for so finding or (ii) as to which the Exchange consents, the Commission will:

A. by order approve or disapprove such proposed rule change, or

B. institute proceedings to determine whether the proposed rule change should be disapproved.

IV. Solicitation of Comments

Interested persons are invited to submit written data, views, and arguments

concerning the foregoing, including whether the proposed rule change is consistent with the Act. Comments may be submitted by any of the following methods:

Electronic comments:

- Use the Commission's Internet comment form (http://www.sec.gov/rules/sro.shtml); or
- Send an e-mail to rule-comments@sec.gov. Please include File Number SR-CBOE-2020-117 on the subject line.

Paper comments:

- Send paper comments in triplicate to Secretary, Securities and Exchange Commission, 100 F Street, NE, Washington, DC 20549-1090.

All submissions should refer to File Number SR-CBOE-2020-117. This file number should be included on the subject line if e-mail is used. To help the Commission process and review your comments more efficiently, please use only one method. The Commission will post all comments on the Commission's Internet website (http://www.sec.gov/rules/sro.shtml). Copies of the submission, all subsequent amendments, all written statements with respect to the proposed rule change that are filed with the Commission, and all written communications relating to the proposed rule change between the Commission and any person, other than those that may be withheld from the public in accordance with the provisions of 5 U.S.C. 552, will be available for website viewing and printing in the Commission's Public Reference Room, 100 F Street, NE, Washington, D.C. 20549 on official business days between the hours of 10:00 a.m. and 3:00 p.m. Copies of the filing also will be available for inspection and copying at the principal office of the Exchange. All comments received will be posted without change;

the Commission does not edit personal identifying information from submissions. You should submit only information that you wish to make available publicly. All submissions should refer to File Number SR-CBOE-2020-117 and should be submitted on or before [insert date 21 days from publication in the Federal Register].

For the Commission, by the Division of Trading and Markets, pursuant to delegated authority.[63]

Secretary

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[63] 17 CFR 200.30-3(a)(12).

EXHIBIT 4

Additions set forth in the proposed rule text of original SR-CBOE-2020-117 are underlined and deletions set forth in the proposed rule text of original SR-CBOE-2020-117 are bracketed. Additions being made pursuant to Amendment No. 1 to SR-CBOE-2020-117 are double underlined and deletions are struck-through.

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Rules of Cboe Exchange, Inc.

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Rule 1.1. Definitions

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Complex Order

The term "complex order" means an order involving the concurrent execution of two or more different series in the same [class]underlying security or index (the "legs" or "components" of the complex order), for the same account, occurring at or near the same time and for the purpose of executing a particular investment strategy with no more than the applicable number of legs (which number the Exchange determines on a class-by-class basis). The Exchange determines in which classes complex orders are eligible for processing. Unless the context otherwise requires, the term complex order includes stock-option orders and security future-option orders. For purposes of Rules 5.33 and 5.85(b)(1), the term "complex order" means a complex order with any ratio equal to or greater than one-to-three (.333) and less than or equal to three-to-one (3.00), an Index Combo order, a stock-option order, or a security future-option order. For the purpose of applying these ratios to complex orders comprised of legs for both mini-options and standard options, ten mini-option contracts represent one standard option contract. For the purpose of applying these ratios to complex orders comprised of legs for both micro-options and standard options, 100 micro-option contracts represent one standard option contract.

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Rule 4.11. Index Option Definitions

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Micro Narrow-Based Index

The term "Micro Narrow-Based Index" means an industry or narrow-based index that meets the specific criteria provided under Rule 4.10(d).

Micro-Option

The term "micro-option" means a~~n~~ broad-based index option for which the value of the underlying is at least 100 with an index multiplier of one. References to "index option" in the Rules include "micro-option" unless the context otherwise requires.

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Rule 4.13. Series of Index Options

(a) – (b) No change.

(c) *Quarterly Index Expirations or QIXs.* The Exchange may open for trading QIXs on the S&P 100, S&P 500, Mini-SPX Index, and Russell 2000 indices. QIXs shall be subject to the provisions of paragraph (a) of this Rule except that, notwithstanding the provisions of paragraph (a)(2) of this Rule, there may be up to eight near- term quarterly expirations open for trading and, notwithstanding the provisions of paragraph (a)(4) of this Rule, QIXs on the S&P 500, Mini-SPX Index, and Russell 2000 stock indices shall be P.M.-settled index options. The index multiplier for QIXs may be 1, 100 or 500.

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Interpretations and Policies

.01 The procedures for adding and deleting strike prices for index options are provided in Rule 54.5 and Interpretations and Policies related thereto, as otherwise generally provided by Rule 4.13, and include the following:

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(l) Notwithstanding any other provision regarding strike price intervals in this Interpretation and Policy .01, the interval between strike prices of series of micro-options is $0.50 or greater. Strike prices for micro-options are set at the same level as for index options with an index multiplier of 100. For example, a micro-option call series with a strike price of 325 has a total deliverable value of $325, while a standard option call series with a strike price of 325 has a total deliverable value of $32,500.

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Rule 4.20. FLEX Option Classes

The Exchange may authorize for trading a FLEX Option class on any equity security or index if it may authorize for trading a non-FLEX Option class on that equity security or index pursuant to Rules 4.3 and 4.10, respectively, even if the Exchange does not list that non-FLEX Option class for trading.

~~(a) The unit of trading for FLEX Equity Options is the same as the unit of trading for non-FLEX Equity Options overlying the same equity security.~~

~~(b) The index multiplier may be 1 ("FLEX Micro Option") or 100 for FLEX Index Options. References to "FLEX Index Option" in the Rules include "FLEX Micro Option" unless the context otherwise requires.~~

Rule 4.21. Series of FLEX Options

(a) No change.

(b) *Terms.* When submitting a FLEX Order for a FLEX Option series to the System, the submitting FLEX Trader must include one of each of the following terms in the FLEX Order (all other terms of a FLEX Option series are the same as those that apply to non-FLEX Options), which terms constitute the FLEX Option series:

(1) underlying equity security or index~~ (including if the index has an index multiplier of 1 or 100)~~, as applicable ~~[~~(the index multiplier for FLEX Index Options is 100)~~]~~;

(2) – (5) No change.

(6) exercise price (which the System rounds to the nearest minimum increment as set forth in Rule 5.4), which may be:

(A) – (B) No change.

~~The exercise price for a FLEX Micro Option series is set at the same level as the exercise price for a FLEX Index Option series in a class with a multiplier of 100. If the exercise price of a FLEX Option series is a fixed price of 50, it will deliver: (A) 100 shares of the underlying security at $50 (with a total deliverable of $5,000) if a FLEX Equity Option; (B) cash equal to 100 (i.e. the index multiplier) times 50 (with a total deliverable value of $5,000) if a FLEX Index Option with a multiplier of 100; and (C) cash equal to one (i.e. the index multiplier) times 50 (with a total deliverable value of $50) if a FLEX Micro Option.~~

~~If the exercise price of a FLEX Option series is 50% of the closing value of the underlying security or index, as applicable, on the trade date, it will deliver: (A) 100 shares of the underlying security at a price equal to 50% of the closing value of the underlying security on the trade date (with a total deliverable of 100 times that percentage amount) if a FLEX Equity Option; (B) cash equal to 100 (i.e. the index multiplier) times a value equal to 50% of the closing value of the underlying index on the trade date (with a total deliverable of 100 times that percentage amount) if a FLEX Index Option with a multiplier of 100; and (C) cash equal to one (i.e. the index multiplier) times a value equal to 50% of the~~

~~closing value of the underlying index on the trade date (with a total deliverable of one times that percentage amount) if a FLEX Micro Option.~~

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Rule 5.3. Bids and Offers

Bids and offers to be effective must either be entered electronically in a form and manner prescribed by the Exchange via Exchange-approved quoting devices or made at the post by public outcry. All bids and offers shall be general ones and shall not be specified for acceptance by particular Trading Permit Holders.

(a) – (b) No change.

(c) *Options with Units of Trading/Index Multipliers Other than 100.*

(1) *Mini-options.* Notwithstanding paragraph (a) above, bids and offers for an option contract overlying 10 shares must be expressed in terms of dollars per 1/10th part of the total value of the contract. For example, an offer of "0.50" represents an offer of $5.00 for an option contract having a unit of trading consisting of 10 shares.

(2) *Micro-Options.* Notwithstanding paragraph (a) above, bids and offers for a micro-option (which has an index multiplier of one) must be expressed in terms of dollars per 1/100th part of the total value of the contract. For example, an offer of "0.50" represents an offer of $0.50 for a micro-option.

(d) No change.

(e) *Other Options.* Notwithstanding paragraphs (a) through (c) above:

(1) – (2) No change.

(3) *FLEX Options.* Bids and offers for FLEX Options must be expressed in (A) U.S. dollars and decimals, if the exercise price for the FLEX Option series is a fixed price~~[,]~~; or (B) a percentage~~[~~, if the exercise price for the FLEX Option series is a percentage of the closing value of the underlying equity security or index on the trade date,~~]~~ per unit ~~(if a FLEX Equity Option or a FLEX Index Option with a multiplier of 100) or per 1/100th unit (if a FLEX Micro Option)~~ of the underlying security or index, as applicable~~, if the exercise price for the FLEX Option series is a percentage of the closing value of the underlying equity security or index on the trade date~~.

~~If the exercise price of a FLEX Option series is a fixed price, a bid of "0.50" represents a bid of (A) $50 (0.50 times 100 shares) for a FLEX Equity Option; (B) $50 (0.50 times an index multiplier of 100) for a FLEX Index Option with a multiplier of 100; and (C) $0.50 (0.50 times an index multiplier of one) for a FLEX Micro Option.~~

~~If the exercise price of a FLEX Option series is a percentage of the closing value of the underlying equity security or index, a bid of "0.50" represents a bid of (A) 50% (0.50 times 100 shares) of the closing value of the underlying equity security on the trade date if a FLEX Equity Option; (B) 50% (0.50 times an index multiplier of 100) of the closing value of the underlying index on the trade date if a FLEX Index Option with a multiplier of 100; and (C) 0.50% (0.50 times an index multiplier of one) of the closing value of the underlying index on the trade date if a FLEX Micro Option. Following application of the designated percentage to the closing value of the underlying security or index, [T]t~~the System rounds bids and offers to the nearest minimum increment.

(4) – (6) No change.

Rule 5.4. Minimum Increments for Bids and Offers

(a) *Simple Orders for Equity and Index Options.* The minimum increments for bids and offers on simple orders for equity and index options are as follows:

Class	Increment	Series Trading Price

* * * * *

Mini-Options	Same as permitted for standard options on the same security
Micro-Options	Same as permitted for index options on the same index

* * * * *

Rule 5.37. Automated Improvement Mechanism ("AIM" or "AIM Auction")

A Trading Permit Holder (the "Initiating TPH") may electronically submit for execution an order it represents as agent ("Agency Order") against principal interest or a solicited order(s) (except for an order for the account of any Market-Maker with an appointment in the applicable class on the Exchange) (an "Initiating Order") provided it submits the Agency Order for electronic execution into an AIM Auction pursuant to this Rule. For purposes of this Rule, the term "NBBO" means the national best bid or national best offer at the particular point in time applicable to the reference, and the term "Initial NBBO" means the national best bid or national best offer at the time an Auction is initiated. Bulk messages are not eligible for AIM.

(a) No change.

(b) *Stop Price.* The Initiating Order must stop the entire Agency Order at a price that satisfies the following:

(1) *NBBO.* The stop price must be:

(A) if a buy (sell) Agency Order is for less than 50 standard option contracts (or 500 mini-option contracts or 5,000 micro-option contracts), at least one minimum increment better than the then-current NBO (NBB) or the Agency Order's limit price (if the order is a limit order), whichever is better; or

(B) if a buy (sell) Agency Order is for 50 standard option contracts (or 500 mini-option contracts or 5,000 micro-option contracts) or more, at or better than the then-current NBO (NBB) or the Agency Order's limit price (if the order is a limit order), whichever is better.

* * * * *

(c) *AIM Auction Process.* Upon receipt of an Agency Order that meets the conditions in paragraphs (a) and (b), the AIM Auction process commences.

(1) *Concurrent Auctions in Same Series.* With respect to Agency Orders for less than 50 standard option contracts (or 500 mini-option contracts or 5,000 micro-option contracts), only one AIM Auction may be ongoing at any given time in a series, and AIM Auctions in the same series may not queue or overlap in any manner. One or more AIM Auctions in the same series for Agency Orders of 50 standard option contracts (or 500 mini-option contracts or 5,000 micro-option contracts) or more may occur at the same time. To the extent there is more than one AIM Auction in a series underway at a time, the AIM Auctions conclude sequentially based on the exact time each AIM Auction commenced, unless terminated early pursuant to paragraph (d). At the time each AIM Auction concludes, the System allocates the Agency Order pursuant to paragraph (e) and takes into account all AIM Auction responses and unrelated orders and quotes in place at the exact time of conclusion. In the event there are multiple AIM Auctions underway that are each terminated early pursuant to paragraph (d), the System processes the AIM Auctions sequentially based on the exact time each AIM Auction commenced.

* * * * *

Rule 5.38. Complex Automated Improvement Mechanism ("C-AIM" or "C-AIM Auction")

A Trading Permit Holder (the "Initiating TPH") may electronically submit for execution a complex order it represents as agent ("Agency Order") against principal interest or a solicited complex order(s) (an "Initiating Order") provided it submits the Agency Order for electronic execution into a C-AIM Auction pursuant to this Rule. For purposes of this Rule, the term "SBBO" means the synthetic best bid or offer on the Exchange at the particular point in time applicable to the reference.

(a) – (b) No change.

(c) *C-AIM Auction Process.* Upon receipt of an Agency Order that meets the conditions in paragraphs (a) and (b), the C-AIM Auction process commences.

(1) *Concurrent C-AIM Auctions in Same Complex Strategies.*

(A) With respect to Agency Orders for which the smallest leg is less than 50 standard option contracts (or 500 mini-option contracts or 5,000 micro-option contracts), only one C-AIM Auction may be ongoing at any given time in a complex strategy, and C-AIM Auctions in the same complex strategy may not queue or overlap in any manner. One or more C-AIM Auctions in the same complex strategy for Agency Orders for which the smallest leg is 50 standard option contracts (or 500 mini-option contracts or 5,000 micro-option contracts) or more may occur at the same time. C-AIM Auctions in different complex strategies may be ongoing at any given time, even if the complex strategies have overlapping components. A C-AIM Auction may be ongoing at the same time as an AIM Auction in any component of the complex strategy.

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Rule 5.39. Solicitation Auction Mechanism ("SAM" or "SAM Auction")

A Trading Permit Holder (the "Initiating TPH") may electronically submit for execution an order it represents as agent ("Agency Order") against a solicited order(s) (which cannot have a Capacity F for the same EFID as the Agency Order or be for the account of any Market-Maker with an appointment in the applicable class on the Exchange) ("Solicited Order") if it submits the Agency Order for electronic execution into a SAM Auction pursuant to this Rule. The Agency Order and Solicited Order cannot both be for the accounts of Priority Customers. For purposes of this Rule, the term "NBBO" means the national best bid or national best offer at the particular point in time applicable to the reference, and the term "Initial NBBO" means the national best bid or national best offer at the time a SAM Auction is initiated.

(a) *SAM Auction Eligibility Requirements.* The Initiating TPH may initiate a SAM Auction if all of the following conditions are met:

(1) – (2) No change.

(3) *Size.* The Agency Order must be for at least the minimum size designated by the Exchange (which may not be less than 500 standard option contracts, [or] 5,000 mini-option contracts, or 50,000 micro-option contracts). The Solicited Order must be for (or must total, if the Solicited Order is comprised of multiple solicited orders) the same size as the Agency Order.

* * * * *

Rule 5.40. Complex Solicitation Auction Mechanism ("C-SAM" or "C-SAM Auction")

A Trading Permit Holder (the "Initiating TPH") may electronically submit for execution a complex order it represents as agent ("Agency Order") against a solicited complex order(s) (which cannot have a Capacity of F for the same EFID as the Agency Order) ("Solicited Order") if it submits the Agency Order for electronic execution into a C-SAM Auction pursuant to this Rule. The Agency Order and Solicited Order cannot both be for the accounts of Priority Customers. For purposes of this Rule, the term "SBBO" means the synthetic best bid or offer on the Exchange at the particular point in time applicable to the reference.

(a) *C-SAM Auction Eligibility Requirements.* The Initiating TPH may initiate a C-SAM Auction if all of the following conditions are met:

(1) – (2) No change.

(3) *Size.* The smallest leg of the Agency Order must be for at least the minimum size designated by the Exchange (which may not be less than 500 standard option contracts, [or] 5,000 mini-option contracts, or 50,000 micro-option contracts). The Solicited Order must be for (or must total, if the Solicited Order is comprised of multiple solicited orders) the same size as the Agency Order. The System handles each of the Agency Order and Solicited Order as an AON order.

* * * * *

Rule 5.50. Market-Maker Appointments

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(g) *Appointment Weights*. A Market-Maker may select for each of its Trading Permits any combination of class appointments. All classes are placed within a specific tier according to trading volume statistics (except for the AA tier) and assigned an "appointment weight" depending upon its tier location as follows:

Appointment Unit Tier	Option Classes	Appointment Weight
AA	Options on the Cboe Volatility Index (VIX)	.500**
* * * * *		
	Options on the S&P 500 ESG Index (SPESG)	.001
	Each Micro-Option Class	.001

* * * * *

Rule 5.65. Definitions

The following terms have the meaning specified in this Rule solely for the purpose of this Section E:

(a) – (c) No change.

(d) "Complex Trade" means: (1) the execution of an order in an option series in conjunction with the execution of one or more related order(s) in different option series in the same underlying security <u>or index</u> occurring at or near the same time in a ratio that is equal to or greater than one-to- three (.333) and less than or equal to three-to-one (3.0) and for the purpose of executing a particular investment strategy (for the purpose of applying the aforementioned ratios to complex trades comprised of both mini-option contracts and standard option contracts, ten (10) mini-option contracts will represent one (1) standard option contract<u>, and for the purpose of applying the aforementioned ratios to complex trades comprised of both micro-option contracts and standard option contracts, 100 micro-option contracts will represent one (1) standard option contract</u>); or (2) the execution of a stock-option order to buy or sell a stated number of units of an underlying stock or a security convertible into the underlying stock ("convertible security") coupled with the purchase or sale of option contract(s) on the opposite side of the market representing either (A) the same number of units of the underlying stock or convertible security, or (B) the number of units of the underlying stock or convertible security necessary to create a delta neutral position, but in no case in a ratio greater than eight-to-one (8.00), where the ratio represents the total number of units of the underlying stock or convertible security in the option leg to the total number of units of the underlying stock or convertible security in the stock leg.

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Rule 5.74. FLEX Solicitation Auction Mechanism ("FLEX SAM" or "FLEX SAM Auction")

A FLEX Trader (the "Initiating FLEX Trader") may electronically submit for execution an order (which may be a simple or complex order) it represents as agent ("Agency Order") against a solicited order(s) (which cannot have a Capacity of F for the same EFID as the Agency Order or, if the Agency Order is a simple order, for the account of any FLEX Market Maker with an appointment in the applicable FLEX Option class on the Exchange) ("Solicited Order") if it submits the Agency Order for electronic execution into a FLEX SAM Auction pursuant to this Rule.

(a) *FLEX SAM Auction Eligibility Requirements.* The Initiating FLEX Trader may initiate a FLEX SAM Auction if all of the following conditions are met:

(1) – (3) No change.

(4) *Size.* The Agency Order must be for at least the minimum size designated by the Exchange (which may not be less than 500 standard option contracts~~,~~ [or] 5,000 mini-option contracts~~, or 50,000 FLEX Micro Option contracts~~). The Solicited Order must be for (or must total, if the Solicited Order is comprised of multiple solicited orders) the same size as the Agency Order. The System handles each of the Agency Order and the Solicited Order as all-or-none.

* * * * *

Rule 5.87. Crossing Orders

(a) – (e) No change.

(f) Notwithstanding the provisions of paragraphs (c) and (d) above, when a Floor Broker holds an option order for the eligible order size or greater ("original order"), the Floor Broker is entitled to cross a certain percentage of the order with other orders that he is holding or in the case of a Public Customer order with a facilitation order of the originating firm (i.e., the firm from which the original customer order originated). The Exchange may determine on a class-by- class basis to include solicited orders within the provisions of this paragraph. In addition, the Exchange may determine on a class-by-class basis the eligible size for an order that may be transacted pursuant to this paragraph; however, the eligible order size may not be less than 50 standard option contracts (or 500 mini-option contracts or 5,000 micro-option contracts). In accordance with his responsibilities for due diligence, a Floor Broker representing an order of the eligible order size or greater that he wishes to cross must request bids and offers for such option series and make all persons in the trading crowd, including the PAR Official, aware of his request.

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Interpretations and Policies

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.07 Rule 5.86(e) does not prohibit a Trading Permit Holder or TPH organization from buying or selling a stock, security futures or futures position following receipt of an option order, including a complex order, but prior to announcing such order to the trading crowd, provided that:

(a) the option order is in a class designated as eligible for "tied hedge" transactions (as described below) as determined by the Exchange and is within the designated tied hedge eligibility size parameters, which parameters are determined by the Exchange and may not be smaller than 500 standard option contracts (or 5,000 mini-option contracts or 50,000 micro-option contracts) per order (multiple orders may not be aggregated to satisfy the size parameter);

* * * * *

Rule 8.31. Position Limits for Broad-Based Index Options

(a) In determining compliance with Rule 8.30, there shall be no position limits for broad-based index option contracts (including reduced-value option contracts and micro-option contracts) on Cboe S&P 500 AM/PM Basis, Cboe S&P 500 Three-Month Realized Variance, Cboe S&P 500 Three-Month Realized Volatility and on the BXM (1/10th value), DJX, OEX, XEO, NDX, RUT, VIX, VXN, VXD, VXST, S&P 500 Dividend Index, and SPX classes. All other broad-based index option contracts shall be subject to a contract limitation fixed by the Exchange, which shall not be larger than the limits provided in the chart below.

* * * * *

(f) Positions in micro-options (with an index multiplier of one) are aggregated with positions in standard options (including reduced-value option contracts) (with an index multiplier of 100) on the same broad-based index. For purposes of determining compliance with the position limits under this Rule 8.31, 100 micro-option contracts equal one standard option contract.

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Rule 8.32. Position Limits for Industry Index Options

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~~(g) Positions in micro-options (with an index multiplier of one) are aggregated with positions in standard options (including reduced-value option contracts) (with an index multiplier of 100) on the same industry index. For purposes of determining compliance with the position limits under this Rule 8.32, 100 micro-option contracts equal one standard option contract.~~

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Rule 8.35. Position Limits for FLEX Options

(a) *FLEX Index Options.*

(1) – (4) No change.

(5) The position limits for FLEX Individual Stock or ETF Based Volatility Index Options are equal to the position limits for Non-FLEX Individual Stock or ETF Based Volatility Index Options established pursuant to Rule 8.34.

(~~[~~5~~]~~6) The position limits for FLEX Index options on the FTSE 100 Index (1/10 th), FTSE China 50 Index (1/100 th), FTSE Emerging Index, FTSE Developed Europe Index, MSCI EAFE Index and MSCI Emerging Market Index are equal to the position limits for Non-FLEX options on the FTSE 100 Index (1/10 th), FTSE China

50 Index (1/100 th), FTSE Emerging Index, FTSE Developed Europe Index, MSCI EAFE Index and MSCI Emerging Market Index.

~~(7) For purposes of determining compliance with the position limits under this Rule 8.35, for full-sized indexes, 100 FLEX Micro Option contracts equal one contract for a FLEX Index Option with a multiplier of 100 with the same underlying index.~~

(b) *Certain Broad-Based FLEX Index Options.* There shall be no position limits for FLEX BXM (1/10th value), DJX, NDX, OEX, RUT, S&P 500 Dividend Index, SPX, VIX, VXN, VXD, Cboe S&P 500 AM/PM Basis, Cboe S&P 500 Three-Month Realized Variance, Cboe S&P 500 Three-Month Realized Volatility or XEO option contracts (including reduced-value option contracts ~~and FLEX Micro Option contracts~~). However, each Trading Permit Holder or TPH organization (other than a FLEX Market-Maker) that maintains a FLEX broad-based index option position on the same side of the market in excess of 100,000 contracts for NDX, OEX, RUT, S&P 500 Dividend Index, SPX, VIX, VXN, VXD, Cboe S&P 500 AM/PM Basis, Cboe S&P 500 Three-Month Realized Variance, Cboe S&P 500 Three-Month Realized Volatility or XEO and 1 million contracts for BXM (1/10th value) and DJX, for its own account or for the account of a customer, shall report information as to whether the positions are hedged and provide documentation as to how such contracts are hedged, in the manner and form prescribed by the Exchange. In calculating the applicable contract-reporting amount, reduced-value contracts will be aggregated with full- value contracts and counted by the amount by which they equal a full-value contract (e.g., 10 XSP options equal 1 SPX full-value contract~~, and 100 FLEX Micro Options equal one FLEX Index Option with a multiplier of 100 overlying the same index~~). The Exchange may specify other reporting requirements of this interpretation as well as the limit at which the reporting requirement may be triggered. In addition, whenever the Exchange determines that a higher margin is warranted in light of the risks associated with an under-hedged FLEX BXM (1/10th value), DJX, NDX, OEX, RUT, S&P 500 Dividend Index, SPX, VIX, VXN, VXD, Cboe S&P 500 AM/PM Basis, Cboe S&P 500 Three-Month Realized Variance, Cboe S&P 500 Three-Month Realized Volatility or XEO options position, the Exchange may consider imposing additional margin upon the account maintaining such under-hedged position, pursuant to its authority under Rule 10.10. Additionally, it should be noted that the clearing firm carrying the account will be subject to capital charges under Rule 15c3-1 under the Exchange Act to the extent of any margin deficiency resulting from the higher margin requirements.

* * * * *

Rule 8.42. Exercise Limits

(a) No change.

(b) *Index Options.* In determining compliance with this Rule 8.42, exercise limits for index option contracts shall be equivalent to the position limits prescribed for option contracts with the nearest expiration date in Rule 8.31, 8.32, or 8.34. There shall be no exercise limits for broad-based index options (including reduced-value option contracts and micro-option

contracts) on Cboe S&P 500 AM/PM Basis, Cboe S&P 500 Three-Month Realized Variance, Cboe S&P 500 Three-Month Realized Volatility and on the BXM (1/10th value), DJX, OEX, XEO, NDX, RUT, VIX, VXN, VXD, VXST, S&P 500 Dividend Index, or SPX.

* * * * *

(g) *FLEX Options.* Exercise limits for FLEX Index and FLEX Individual Stock or ETF Based Volatility Index Options shall be equivalent to the FLEX position limits prescribed in Rule 8.35. There shall be no exercise limits for broad-based FLEX Index Options (including reduced-value option contracts ~~and FLEX Micro Options~~) on BXM (1/10th value), DJX, NDX, OEX, RUT, S&P 500 Dividend Index, SPX, VIX, VXN, VXD, Cboe S&P 500 AM/PM Basis, Cboe S&P 500 Three-Month Realized Variance, Cboe S&P 500 Three-Month Realized Volatility and XEO.

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EXHIBIT 5

(additions are underlined; deletions are [bracketed])

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Rules of Cboe Exchange, Inc.

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Rule 1.1. Definitions

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Complex Order

The term "complex order" means an order involving the concurrent execution of two or more different series in the same [class]underlying security or index (the "legs" or "components" of the complex order), for the same account, occurring at or near the same time and for the purpose of executing a particular investment strategy with no more than the applicable number of legs (which number the Exchange determines on a class-by-class basis). The Exchange determines in which classes complex orders are eligible for processing. Unless the context otherwise requires, the term complex order includes stock-option orders and security future-option orders. For purposes of Rules 5.33 and 5.85(b)(1), the term "complex order" means a complex order with any ratio equal to or greater than one-to-three (.333) and less than or equal to three-to-one (3.00), an Index Combo order, a stock-option order, or a security future-option order. For the purpose of applying these ratios to complex orders comprised of legs for both mini-options and standard options, ten mini-option contracts represent one standard option contract. For the purpose of applying these ratios to complex orders comprised of legs for both micro-options and standard options, 100 micro-option contracts represent one standard option contract.

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Rule 4.11. Index Option Definitions

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Micro Narrow-Based Index

The term "Micro Narrow-Based Index" means an industry or narrow-based index that meets the specific criteria provided under Rule 4.10(d).

Micro-Option

The term "micro-option" means a broad-based index option for which the value of the underlying is at least 100 with an index multiplier of one. References to "index option" in the Rules include "micro-option" unless the context otherwise requires.

* * * * *

Rule 4.13. Series of Index Options

(a) – (b) No change.

(c) *Quarterly Index Expirations or QIXs.* The Exchange may open for trading QIXs on the S&P 100, S&P 500, Mini-SPX Index, and Russell 2000 indices. QIXs shall be subject to the provisions of paragraph (a) of this Rule except that, notwithstanding the provisions of paragraph (a)(2) of this Rule, there may be up to eight near- term quarterly expirations open for trading and, notwithstanding the provisions of paragraph (a)(4) of this Rule, QIXs on the S&P 500, Mini-SPX Index, and Russell 2000 stock indices shall be P.M.-settled index options. The index multiplier for QIXs may be 1, 100 or 500.

* * * * *

Interpretations and Policies

.01 The procedures for adding and deleting strike prices for index options are provided in Rule 54.5 and Interpretations and Policies related thereto, as otherwise generally provided by Rule 4.13, and include the following:

* * * * *

(l) Notwithstanding any other provision regarding strike price intervals in this Interpretation and Policy .01, the interval between strike prices of series of micro-options is $0.50 or greater. Strike prices for micro-options are set at the same level as for index options with an index multiplier of 100. For example, a micro-option call series with a strike price of 325 has a total deliverable value of $325, while a standard option call series with a strike price of 325 has a total deliverable value of $32,500.

* * * * *

Rule 5.3. Bids and Offers

Bids and offers to be effective must either be entered electronically in a form and manner prescribed by the Exchange via Exchange-approved quoting devices or made at the post by public outcry. All bids and offers shall be general ones and shall not be specified for acceptance by particular Trading Permit Holders.

(a) – (b) No change.

(c) *Options with Units of Trading/Index Multipliers Other than 100.*

(1) *Mini-options.* Notwithstanding paragraph (a) above, bids and offers for an option contract overlying 10 shares must be expressed in terms of dollars per 1/10th part of the total value of the contract. For example, an offer of "0.50" represents an offer of $5.00 for an option contract having a unit of trading consisting of 10 shares.

(2) *Micro-Options.* Notwithstanding paragraph (a) above, bids and offers for a micro-option (which has an index multiplier of one) must be expressed in terms of dollars per 1/100th part of the total value of the contract. For example, an offer of "0.50" represents an offer of $0.50 for a micro-option.

(d) – (e) No change.

Rule 5.4. Minimum Increments for Bids and Offers

(a) *Simple Orders for Equity and Index Options.* The minimum increments for bids and offers on simple orders for equity and index options are as follows:

Class	Increment	Series Trading Price
* * * * *		
Mini-Options	Same as permitted for standard options on the same security	
Micro-Options	Same as permitted for index options on the same index	
* * * * *		

Rule 5.37. Automated Improvement Mechanism ("AIM" or "AIM Auction")

A Trading Permit Holder (the "Initiating TPH") may electronically submit for execution an order it represents as agent ("Agency Order") against principal interest or a solicited order(s) (except for an order for the account of any Market-Maker with an appointment in the applicable class on the Exchange) (an "Initiating Order") provided it submits the Agency Order for electronic execution into an AIM Auction pursuant to this Rule. For purposes of this Rule, the term "NBBO" means the national best bid or national best offer at the particular point in time applicable to the reference, and the term "Initial NBBO" means the national best bid or national best offer at the time an Auction is initiated. Bulk messages are not eligible for AIM.

(a) No change.

(b) *Stop Price.* The Initiating Order must stop the entire Agency Order at a price that satisfies the following:

(1) *NBBO.* The stop price must be:

(A) if a buy (sell) Agency Order is for less than 50 standard option contracts (or 500 mini-option contracts or 5,000 micro-option contracts), at least one minimum increment better than the then-current NBO (NBB) or the Agency Order's limit price (if the order is a limit order), whichever is better; or

(B) if a buy (sell) Agency Order is for 50 standard option contracts (or 500 mini-option contracts or 5,000 micro-option contracts) or more, at or better than the then-current NBO (NBB) or the Agency Order's limit price (if the order is a limit order), whichever is better.

* * * * *

(c) *AIM Auction Process.* Upon receipt of an Agency Order that meets the conditions in paragraphs (a) and (b), the AIM Auction process commences.

(1) *Concurrent Auctions in Same Series.* With respect to Agency Orders for less than 50 standard option contracts (or 500 mini-option contracts or 5,000 micro-option contracts), only one AIM Auction may be ongoing at any given time in a series, and AIM Auctions in the same series may not queue or overlap in any manner. One or more AIM Auctions in the same series for Agency Orders of 50 standard option contracts (or 500 mini-option contracts or 5,000 micro-option contracts) or more may occur at the same time. To the extent there is more than one AIM Auction in a series underway at a time, the AIM Auctions conclude sequentially based on the exact time each AIM Auction commenced, unless terminated early pursuant to paragraph (d). At the time each AIM Auction concludes, the System allocates the Agency Order pursuant to paragraph (e) and takes into account all AIM Auction responses and unrelated orders and quotes in place at the exact time of conclusion. In the event there are multiple AIM Auctions underway that are each terminated early pursuant to paragraph (d), the System processes the AIM Auctions sequentially based on the exact time each AIM Auction commenced.

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Rule 5.38. Complex Automated Improvement Mechanism ("C-AIM" or "C-AIM Auction")

A Trading Permit Holder (the "Initiating TPH") may electronically submit for execution a complex order it represents as agent ("Agency Order") against principal interest or a solicited complex order(s) (an "Initiating Order") provided it submits the Agency Order for electronic execution into a C-AIM Auction pursuant to this Rule. For purposes of this Rule, the term "SBBO" means the synthetic best bid or offer on the Exchange at the particular point in time applicable to the reference.

(a) – (b) No change.

(c) *C-AIM Auction Process.* Upon receipt of an Agency Order that meets the conditions in paragraphs (a) and (b), the C-AIM Auction process commences.

(1) *Concurrent C-AIM Auctions in Same Complex Strategies.*

(A) With respect to Agency Orders for which the smallest leg is less than 50 standard option contracts (or 500 mini-option contracts or 5,000 micro-option contracts), only one C-AIM Auction may be ongoing at any given

time in a complex strategy, and C-AIM Auctions in the same complex strategy may not queue or overlap in any manner. One or more C-AIM Auctions in the same complex strategy for Agency Orders for which the smallest leg is 50 standard option contracts (or 500 mini-option contracts or 5,000 micro-option contracts) or more may occur at the same time. C-AIM Auctions in different complex strategies may be ongoing at any given time, even if the complex strategies have overlapping components. A C-AIM Auction may be ongoing at the same time as an AIM Auction in any component of the complex strategy.

* * * * *

Rule 5.39. Solicitation Auction Mechanism ("SAM" or "SAM Auction")

A Trading Permit Holder (the "Initiating TPH") may electronically submit for execution an order it represents as agent ("Agency Order") against a solicited order(s) (which cannot have a Capacity F for the same EFID as the Agency Order or be for the account of any Market-Maker with an appointment in the applicable class on the Exchange) ("Solicited Order") if it submits the Agency Order for electronic execution into a SAM Auction pursuant to this Rule. The Agency Order and Solicited Order cannot both be for the accounts of Priority Customers. For purposes of this Rule, the term "NBBO" means the national best bid or national best offer at the particular point in time applicable to the reference, and the term "Initial NBBO" means the national best bid or national best offer at the time a SAM Auction is initiated.

(a) *SAM Auction Eligibility Requirements.* The Initiating TPH may initiate a SAM Auction if all of the following conditions are met:

(1) – (2) No change.

(3) *Size.* The Agency Order must be for at least the minimum size designated by the Exchange (which may not be less than 500 standard option contracts, [or] 5,000 mini-option contracts, or 50,000 micro-option contracts). The Solicited Order must be for (or must total, if the Solicited Order is comprised of multiple solicited orders) the same size as the Agency Order.

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Rule 5.40. Complex Solicitation Auction Mechanism ("C-SAM" or "C-SAM Auction")

A Trading Permit Holder (the "Initiating TPH") may electronically submit for execution a complex order it represents as agent ("Agency Order") against a solicited complex order(s) (which cannot have a Capacity of F for the same EFID as the Agency Order) ("Solicited Order") if it submits the Agency Order for electronic execution into a C-SAM Auction pursuant to this Rule. The Agency Order and Solicited Order cannot both be for the accounts of Priority Customers. For purposes of this Rule, the term "SBBO" means the

synthetic best bid or offer on the Exchange at the particular point in time applicable to the reference.

(a) *C-SAM Auction Eligibility Requirements.* The Initiating TPH may initiate a C-SAM Auction if all of the following conditions are met:

(1) – (2) No change.

(3) *Size.* The smallest leg of the Agency Order must be for at least the minimum size designated by the Exchange (which may not be less than 500 standard option contracts, [or] 5,000 mini-option contracts, or 50,000 micro-option contracts). The Solicited Order must be for (or must total, if the Solicited Order is comprised of multiple solicited orders) the same size as the Agency Order. The System handles each of the Agency Order and Solicited Order as an AON order.

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Rule 5.50. Market-Maker Appointments

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(g) *Appointment Weights*. A Market-Maker may select for each of its Trading Permits any combination of class appointments. All classes are placed within a specific tier according to trading volume statistics (except for the AA tier) and assigned an "appointment weight" depending upon its tier location as follows:

Appointment Unit Tier	Option Classes	Appointment Weight
AA	Options on the Cboe Volatility Index (VIX)	.500**
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	Options on the S&P 500 ESG Index (SPESG)	.001
	Each Micro-Option Class	.001

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Rule 5.65. Definitions

The following terms have the meaning specified in this Rule solely for the purpose of this Section E:

(a) – (c) No change.

(d) "Complex Trade" means: (1) the execution of an order in an option series in conjunction with the execution of one or more related order(s) in different option series in the same

underlying security or index occurring at or near the same time in a ratio that is equal to or greater than one-to- three (.333) and less than or equal to three-to-one (3.0) and for the purpose of executing a particular investment strategy (for the purpose of applying the aforementioned ratios to complex trades comprised of both mini-option contracts and standard option contracts, ten (10) mini-option contracts will represent one (1) standard option contract, and for the purpose of applying the aforementioned ratios to complex trades comprised of both micro-option contracts and standard option contracts, 100 micro-option contracts will represent one (1) standard option contract); or (2) the execution of a stock-option order to buy or sell a stated number of units of an underlying stock or a security convertible into the underlying stock ("convertible security") coupled with the purchase or sale of option contract(s) on the opposite side of the market representing either (A) the same number of units of the underlying stock or convertible security, or (B) the number of units of the underlying stock or convertible security necessary to create a delta neutral position, but in no case in a ratio greater than eight-to-one (8.00), where the ratio represents the total number of units of the underlying stock or convertible security in the option leg to the total number of units of the underlying stock or convertible security in the stock leg.

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Rule 5.87. Crossing Orders

(a) – (e) No change.

(f) Notwithstanding the provisions of paragraphs (c) and (d) above, when a Floor Broker holds an option order for the eligible order size or greater ("original order"), the Floor Broker is entitled to cross a certain percentage of the order with other orders that he is holding or in the case of a Public Customer order with a facilitation order of the originating firm (i.e., the firm from which the original customer order originated). The Exchange may determine on a class-by- class basis to include solicited orders within the provisions of this paragraph. In addition, the Exchange may determine on a class-by-class basis the eligible size for an order that may be transacted pursuant to this paragraph; however, the eligible order size may not be less than 50 standard option contracts (or 500 mini-option contracts or 5,000 micro-option contracts). In accordance with his responsibilities for due diligence, a Floor Broker representing an order of the eligible order size or greater that he wishes to cross must request bids and offers for such option series and make all persons in the trading crowd, including the PAR Official, aware of his request.

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Interpretations and Policies

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.07 Rule 5.86(e) does not prohibit a Trading Permit Holder or TPH organization from buying or selling a stock, security futures or futures position following receipt of an option order, including a complex order, but prior to announcing such order to the trading crowd, provided that:

(a) the option order is in a class designated as eligible for "tied hedge" transactions (as described below) as determined by the Exchange and is within the designated tied hedge eligibility size parameters, which parameters are determined by the Exchange and may not be smaller than 500 standard option contracts (or 5,000 mini-option contracts or 50,000 micro-option contracts) per order (multiple orders may not be aggregated to satisfy the size parameter);

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Rule 8.31. Position Limits for Broad-Based Index Options

(a) In determining compliance with Rule 8.30, there shall be no position limits for broad-based index option contracts (including reduced-value option contracts and micro-option contracts) on Cboe S&P 500 AM/PM Basis, Cboe S&P 500 Three-Month Realized Variance, Cboe S&P 500 Three-Month Realized Volatility and on the BXM (1/10th value), DJX, OEX, XEO, NDX, RUT, VIX, VXN, VXD, VXST, S&P 500 Dividend Index, and SPX classes. All other broad-based index option contracts shall be subject to a contract limitation fixed by the Exchange, which shall not be larger than the limits provided in the chart below.

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(f) Positions in micro-options (with an index multiplier of one) are aggregated with positions in standard options (including reduced-value option contracts) (with an index multiplier of 100) on the same broad-based index. For purposes of determining compliance with the position limits under this Rule 8.31, 100 micro-option contracts equal one standard option contract.

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Rule 8.42. Exercise Limits

(a) No change.

(b) *Index Options.* In determining compliance with this Rule 8.42, exercise limits for index option contracts shall be equivalent to the position limits prescribed for option contracts with the nearest expiration date in Rule 8.31, 8.32, or 8.34. There shall be no exercise limits for broad-based index options (including reduced-value option contracts and micro-option contracts) on Cboe S&P 500 AM/PM Basis, Cboe S&P 500 Three-Month Realized Variance, Cboe S&P 500 Three-Month Realized Volatility and on the BXM (1/10th value), DJX, OEX, XEO, NDX, RUT, VIX, VXN, VXD, VXST, S&P 500 Dividend Index, or SPX.

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