



June 24, 2021

Ms. Vanessa Countryman
Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

**Re: Securities Exchange Act Release Nos. 91264 and 91265 (the “Approval Orders”);
File Nos. SR-CboeBZX-2020-070 and SR-CboeBZX-2020-053 (the “Proposals”),
respectively**

Dear Ms. Countryman:

Cboe BZX Exchange, Inc. (“Cboe” or the “Exchange”) submits this letter to reiterate its earlier comments in the May 7, 2021 statement submitted in support of the Approval Orders (the “Statement in Support”)¹ and to encourage the Securities and Exchange Commission (the “Commission”) to act promptly to affirm the Approval Orders and allow shares of the -1x Short VIX Futures ETF (“SVIX”) and 2x Long VIX Futures ETF (“UVIX”) to list and trade on the Exchange.

As highlighted in the Statement in Support and the May 7, 2021 letter submitted by Volatility Shares LLC,² the review process to list SVIX and UVIX has been extensive, beginning when the original proposal to list SVIX was submitted by the Exchange on January 2, 2020.³ In addition to the review period associated with the Original Proposal, the period of review specifically applicable to each of the Proposals has now exceeded the time periods for Commission

¹ See letter from Kyle Murray, Vice President, Associate General Counsel, Cboe Global Markets, Inc. (May 7, 2021). Available at <https://www.sec.gov/comments/sr-cboebzx-2020-053/srcboebzx2020053-8785689-237725.pdf>.

² See letter from Barry Pershkov, Partner, Chapman and Cutler LLP (May 7, 2021). Available at <https://www.sec.gov/comments/sr-cboebzx-2020-070/srcboebzx2020070-8776555-237693.pdf>.

³ See Securities Exchange Act Release No. 87985 (January 16, 2020), 85 FR 4007 (January 23, 2020) (SR-CboeBZX-2020-002) (the “Original Proposal”). The Original Proposal was subsequently withdrawn on September 4, 2020 as the time period for review neared its end.

