

September 12, 2014

Secretary  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549-1090

Re: File No. SR-EDGX-2014-18  
Response to Comment Letter (“Response”)

To Whom It May Concern:

On July 16, 2014, EDGX Exchange, Inc. (the “Exchange” or “EDGX”) filed with the Securities and Exchange Commission (the “SEC” or “Commission”) a proposed rule change to amend Exchange Rule 1.5 and Chapter XI of its rule book to include additional specificity regarding the current functionality of the Exchange’s system, including the operation of its order types and order instructions (the “Proposal”). On July 31, 2014, the Commission published the proposed rule change for comment in the Federal Register.<sup>1</sup> The Commission received one comment letter in response to the proposed rule change.<sup>2</sup> The Exchange submits this letter in response to the comment letter.

As discussed more fully in the Proposal, the Exchange proposed to amend various sections of its rule book to include additional specificity and update its rule book to reflect current functionality of the Exchange’s System, including the operation of its order types and order instructions. Importantly, with limited exceptions,<sup>3</sup> the Proposal would not substantively modify the operation of any of the current defined order types or terms or the operation of the System; rather, it provides additional specificity and transparency to Members, Users, and the investing public regarding the Exchange’s order types and system functionality, and proposes to organize the Exchange’s rules in a more intuitive and less complex manner.<sup>4</sup>

The points raised by the commenter are either not responsive to the issues raised in the Proposal or aimed at existing system functionality or elements of U.S. market structure that have been previously approved by the Commission and are available on other exchanges and in the

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<sup>1</sup> See Securities Exchange Act Release No. 72676 (July 25, 2014), 79 FR 44520 (July 31, 2014) (“Notice of Proposal”). The comment period closed on August 21, 2014.

<sup>2</sup> See Letter from Suzanne Hamlet Shatto to the Commission, dated August 19, 2014.

<sup>3</sup> See Notice of Proposal, n. 4, 79 FR at 44520.

<sup>4</sup> Mary Jo White, Chair, Commission, Speech at the Sandler O’Neill & Partners, L.P. Global Exchange and Brokerage Conference, (June 5, 2014), available at <http://www.sec.gov/News/Speech/Detail/Speech/1370542004312#.U7rxBLE4KSo>.

Secretary  
September 12, 2014  
Page 2 of 2

marketplace generally. Therefore, the Exchange will not respond to the comments, which are not germane to the Proposal.

Sincerely,



Eric Swanson, Esq.  
EVP, General Counsel

cc: David Shillman, Associate Director, Division of Trading and Markets, SEC  
David Hsu, Assistant Director, Division of Trading and Markets, SEC  
Marc McKayle, Special Counsel, Division of Trading and Markets, SEC  
Adam Moore, Special Counsel, Division of Trading and Markets, SEC