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May 24, 2023

Vanessa Countryman, Secretary  
U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549-0609

Re: Proposed Rule Changes to Amend Multiple Fees

Miami International Securities Exchange LLC:  
SR-MIAX-2023-18; Rel. No. 34-97419

MIAX Pearl, LLC:  
SR-PEARL-2023-19; Rel. No. 34-97420

MIAX Emerald, LLC:  
SR-EMERALD-2023-12; Rel. No. 34-97422

Dear Ms. Countryman:

Susquehanna International Group, LLP ("SIG") appreciates the opportunity to comment on the above-noted proposed fee increases by the above-referenced exchanges (together, the "Exchanges"). The subject fee filings are essentially re-filings of the Proposed Fee Increases filed on January 10, 2023 that were subsequently withdrawn by the Exchanges, re-filed on March 8, 2023 and again withdrawn; and they are the ninth unavailing attempt to increase the subject connectivity fees.

As the instant fee filings are only slightly modified versions of the Exchanges' March 8<sup>th</sup> filings, and do not differ in any substantive or material way, SIG re-asserts its comment letter to the prior filings, which was submitted on March 21, 2023, and hereby incorporates said letter herein together with its previously incorporated SIG comment letters. We again note that the Exchanges have not meaningfully addressed any of the criticisms and objections in SIG's prior comment letters; and, we continue to object to the proposed fee increases.

Respectfully,

Gerald D. O'Connell