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September 8, 2021

Via Electronic Submission

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

Re: Nasdaq PHLX LLC (Phlx); Notice of Filing of Proposed Rule Change to Permit Monday and Wednesday Expirations for Options Listed Pursuant to the Short Term Option Series Program on the iShares Russell 2000 ETF ("IWM") (Release No. 34-92655; File No. SR-Phlx-2021-43)

Dear Ms. Countryman:

Optiver US LLC¹ ("Optiver") submits this comment letter in support of the Nasdaq PHLX LLC ("Phlx" or "the Exchange") proposal to list Monday and Wednesday expirations for options on the the iShares Russell 2000 ("IWM") ETF pursuant to the Short Term Options Series Program ("the Program").

The expansion of the Short Term Options Series Program to include Monday and Wednesday option listings on IWM would promote more effective risk management by offering market participants additional hedging opportunities and expiration flexibility.² Market-impacting events, such as elections and corporate earnings releases, can occur throughout the week. For example, less than 10% of the 1,977 companies that comprise the basket in IWM have announced or will announce earnings on a Friday.³ Currently, participants that want to hedge those earnings events with related index options must opt for an imprecisely matched expiration. The addition of Monday and Wednesday expirations permits participants to manage a more tailored and cost effective hedge for a specific event date.

Optiver agrees with the Exchange's assertion⁴ that the Short Term Options Series Program has been successful to date. This success is demonstrated by the increase in industry volume in Monday and Wednesday option listings on the SPDR S&P 500 ("SPY") ETF Trust and the Invesco QQQ TrustSM Series ("QQQ") ETF Trust, both of which were previously approved by the Commission.⁵ Over 260 million option contracts traded in SPY Monday and Wednesday expiration dates in 2021.⁶ Since the launch of Monday and Wednesday QQQ options on April 23, 2021, nearly 29 million option contracts have traded in the Monday and Wednesday expiration dates. An observation of industry cleared QQQ option volumes during the peak corporate earnings release season in July 2021 showed that in 12 of the 22 trading dates in July, 30% of cleared volume transacted in

¹ Established in 1986, Optiver has offices in Amsterdam (Optiver B.V.), Chicago (Optiver US LLC), London (Optiver FX Ltd), Shanghai (Optiver Asia Pacific), and Sydney (Optiver Asia Pacific). With over 1,300 employees, Optiver provides liquidity on over 100 exchanges globally in listed derivatives, cash equities, ETFs, bonds and foreign currencies.

² File No. SR-Phlx-2021-43 page 7

³ Observation of the companies comprising the IWM basket on August 9, 2021

⁴ File No. SR-Phlx-2021-43 page 7

⁵ SR-BOX-2016-28, SR-Phlx-2016-89, SR-Phlx-2017-13, SR-Phlx-2021-10

⁶ Volume compiled from OCC on August 25, 2021. Volumes traded in SPY quarterly expiration dates have been excluded



the Monday and Wednesday expiration dates,⁷ which clearly shows their utility to the market. The increased volume in Monday and Wednesday expiration dates illustrates the demand for a more precise expiration date.

Optiver further agrees with the Exchange's assertion that expanding the Program to include Monday and Wednesday expirations for options on IWM is consistent with the objectives of the Securities Exchange Act and helps perfect the mechanism of a free and open market.⁸ As described above, this proposal will enhance the total liquidity and risk management opportunities that the US options market offers, and will further enhance the overall health of the US listed options market. In addition, the proposal will help protect investors by providing them with more tailored investment and hedging options.

Optiver appreciates this opportunity to support and to provide further comment on the Proposal. Please contact Liam Smith, Head of Corporate Strategy, Optiver US LLC, at [REDACTED] if you have any questions about this letter.

Respectfully Submitted,

Michael Golding

Michael Golding
Head of Trading
Optiver US LLC

⁷ Volume data compiled from OCC on August 25, 2021 <https://www.theocc.com/Market-Data/Market-Data-Reports/Volume-and-Open-Interest/Volume-Query>

⁸ File No. SR-Phlx-2021-43 Page 7