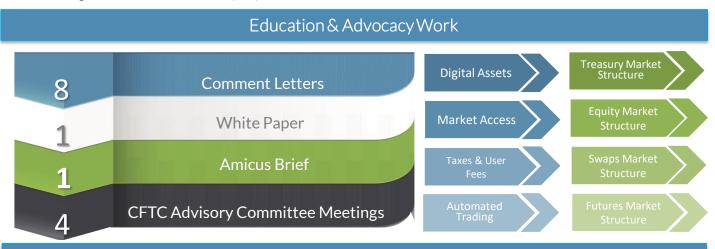


2021 Mid-Year Report

As members continued working from home, the Group prioritized its advocacy efforts for 2021 while waiting for new administration personnel to be appointed. Treasury market structure discussions resulted in a white paper focused on central clearing in Treasuries. Market access concerns continued and resulted in a comment letter and an Amicus brief. CAT proposals were once again the focus of the Equity Market Structure Committee.



Comment Letters

- SEC: <u>Proposed amendment to NMS Plan Governing the Consolidated Audit Trail</u>.
- SEC: Market access concerns with the Nasdaq Carteret data center.
- SEC: <u>Proposed expansion of Regulations ATS and SCI</u>.
- SEC: Cboe proposed expansion of Voluntary Compression Service for Market Makers.
- SEC: <u>Consolidated Audit Trail revised funding model proposal</u>.
- Finra: <u>Proposed enhancements to TRACE reporting for US Treasury Securities</u>.
- HMT: U.K. HM Treasury Call for Evidence on the Overseas Financial Services Framework.
- Other: <u>Joint-trade letter on the NY Stock Transfer Tax</u>.

White Paper

• Published a white paper on central clearing in the Treasury market – "<u>Clearing a Path to a More</u> Resilient Treasury Market."

Amicus Brief

 Joined SIFMA in filing an Amicus Brief in the NYSE Group v. SEC petition for review of a final order of the SEC in connection with access to the Mahwah data center.