

# FINANCIAL INFORMATION FORUM

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New York, New York 10004

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## Via Electronic Delivery

September 27, 2017

Ms. Heather Seidel  
Acting Director, Division of Trading and Markets  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-1090

Re: *SEC Order Instituting Proceedings to Determine Whether to Approve or Disapprove the Proposed Rule Changes, as Modified by Amendments Thereto, to Eliminate Requirements That Will Be Duplicative of CAT.*

Dear Ms. Seidel,

The Financial Information Forum ("FIF")<sup>1</sup> Consolidated Audit Trail Working Group ("FIF CAT WG") requests a brief deferral for our submission of a comment letter on the August 30, 2017 SEC Order Instituting Proceedings to Determine Whether to Approve or Disapprove the Proposed Rule Changes, as Modified by Amendments Thereto, to Eliminate Requirements That Will be Duplicative of CAT.

FIF is requesting two additional days in order to properly complete the review of our response to the SRO retirement proposals as well as vet our responses to the 15 enumerated questions<sup>2</sup> posed by The Commission. FIF and its members have been consumed with providing thoughtful responses to the SRO retirement proposal as well as reviewing the Draft CAT Reporting Specification for Industry Members V0.1<sup>3</sup>, distributed on September 7, 2017 and requiring a response by September 25, 2017.

We plan to submit our comment letter on the Proposed Rule Changes to eliminate CAT duplicative systems by Friday, September 29. Thank you for your consideration of FIF's request for a brief deferral.

Sincerely,



William H. Hebert  
Managing Director  
Financial Information Forum

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<sup>1</sup> FIF ([www.fif.com](http://www.fif.com)) was formed in 1996 to provide a centralized source of information on the implementation issues that impact the securities industry across the order lifecycle. Our participants include trading and back office service bureaus, broker-dealers, market data vendors and exchanges. Through topic-oriented working groups, FIF participants focus on critical issues and productive solutions to technology developments, regulatory initiatives, and other industry changes.

<sup>2</sup> [SEC Release No. 34-81499](#) at 43-47.

<sup>3</sup> [CAT Reporting Specification for Industry Members V0.1](#).

