



**Re: Cboe's Rule Filing for Post-Migration Fees; File No. SR-CBOE-2020-064**

X-Change Financial Access, LLC submits this comment letter in response to Cboe Exchange, Inc.'s ("Cboe") proposal to adopt connectivity and access fees in connection with its technology migration in the fall of 2019. We support Cboe's proposed fees and new connectivity structure, which provide several benefits to market participants including improved system performance and operational efficiencies. We believe the proposed fees are reasonable and encourage the Commission to allow the fees to remain effective and avoid an unnecessary suspension and disapproval proceeding.

Respectfully

A handwritten signature in black ink, appearing to read 'William Ellington', is written over a light blue horizontal line.

William Ellington  
Managing Member/CEO  
X-Change Financial Access