



October 28, 2014

Via Electronic Mail (rule-comments@sec.gov)

U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549-1090
Attention: Brent J. Fields, Secretary

COMMENT LETTER AND PETITION FOR DISAPPROVAL

Re: Notice of Filing and Immediate Effectiveness of the Twentieth Substantive Amendment to the Second Restatement of the CTA Plan and Fourteenth Substantive Amendment to the Restated CQ Plan, Release No. 34-73285; File No. SR-CTA/CQ-2014-02 (Oct. 1, 2014)

Notice of Filing and Immediate Effectiveness of Amendment No. 33 to the Joint Self-Regulatory Organization Plan Governing the Collection, Consolidation and Dissemination of Quotation and Transaction Information for Nasdaq-Listed Securities Traded on Exchanges on an Unlisted Trading Privileges Basis Submitted by the BATS Exchange, Inc., BATS Y-Exchange, Inc., Chicago Board Options Exchange, Incorporated, Chicago Stock Exchange, Inc., EDGA Exchange, Inc., EDGX Exchange, Inc., Financial Industry Regulatory Authority, Inc., International Securities Exchange LLC, NASDAQ OMX BX, Inc., NASDAQ OMX PHLX LLC, Nasdaq Stock Market LLC, National Stock Exchange, Inc., New York Stock Exchange LLC, NYSE MKT LLC, and NYSE Arca, Inc., Release No. 34-73279; File No. S7-24-89 (Oct. 1, 2014)

Dear Mr. Fields:

SIFMA¹ appreciates the opportunity to comment on the above-captioned notices (the "Notices"), issued by the CTA and UTP plan operators. SIFMA would like to clarify the interaction and feedback provided by SIFMA as referenced in each of the Notices. Both notices refer to "feedback received from SIFMA." Such feedback was given during a single 90 minute meeting held in late April 2014, during which the exchange representatives shared

¹ The Securities Industry and Financial Markets Association (SIFMA) brings together the shared interests of hundreds of securities firms, banks and asset managers. SIFMA's mission is to develop policies and practices which strengthen financial markets and which encourage capital availability, job creation and economic growth while building trust and confidence in the financial industry. SIFMA, with offices in New York and Washington, D.C., is the U.S. regional member of the Global Financial Markets Association (GFMA).

some limited details of these proposals with SIFMA members, but such proposals were not discussed at any length or in any detail because such details were not made available at that time. Despite SIFMA's follow-up requests for more details to provide informed comments, the plans failed to give any. As a result, SIFMA did not provide formal comments or feedback, so any such reference should not be deemed as SIFMA acquiescing to the content of these Notices. Further, SIFMA has filed 19(d) applications for each of these Notices.

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If you have any questions or you would like to discuss these matters further, please call Melissa MacGregor, Managing Director and Associate General Counsel at SIFMA, at [REDACTED].

Respectfully submitted,

Ira D. Hammerman
Executive Vice President & General Counsel