

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

Re: Proposed Rule Changes to Amend Multiple Fees

> Miami International Securities Exchange LLC ("MIAX"): SR-MIAX-2023-39; Rel. No. 34-98752

MIAX Pearl, LLC ("PEARL"): SR-PEARL-2023-55; Rel. No. 34- 98753

MIAX Emerald, LLC ("EMERALD"): SR-EMERALD-2023-27; Rel. No. 34- 98751

Dear Ms. Countryman:

Susquehanna International Group, LLP ("SIG") appreciates the opportunity to comment on the abovenoted proposed fee increases by the above-referenced exchanges (together, the "Exchanges"). The subject fee filings are essentially re-filings of the Proposed Fee Increases filed on January 10, 2023, March 8, 2023, May 2, 2023, June 27, 2023, and August 8, 2023; and they are the twelfth iteration of unavailing filings by the Exchanges to increase their subject connectivity fees.

Once again, the subject fee filings are, in all material respects, almost verbatim repetitions of the Exchanges' earlier filings. The immaterial gloss from the minor language additions and re-phrasings contained in the subject letters does not fundamentally redress the valid critiques that SIG raised in its prior letters objecting to the subject fee increases. Accordingly, once again, SIG incorporates its prior comment letters, and continues its objections to the proposed fee filings.

Respectfully,

Gerald D. O'Connell