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NYSE EURONEXT

April 5, 2013

VIA ELECTRONIC SUBMISSION AND FEDERAL EXPRESS DELIVERY

Ms. Elizabeth M. Murphy
Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549-1090

Re: Securities Exchange Act Release Nos. 34-69032 and 34-69033; File Nos. SR-NYSEARCA-2013-10 and SR-NYSEMKT-2013-10 (the "Rule Proposals")

Dear Ms. Murphy:

NYSE Euronext, on behalf of NYSE Arca, Inc. ("NYSE Arca") and NYSE MKT, LLC ("NYSE MKT" and, collectively with NYSE Arca, the "Exchanges"), submits this letter to make additional representations regarding the analysis that the Exchanges will conduct in connection with how the Exchange proposes to treat the obvious error rules in response to the Regulation NMS Plan to Address Extraordinary Market Volatility (the "Plan").

In the Rule Proposals, the Exchanges have proposed that electronic transactions in stock options that occur during a Limit State or a Straddle State, as those terms are defined in the Plan, would not be subject to review under the Exchanges' rules for obvious errors or catastrophic errors.[1] On April 1, 2013, the Exchanges each filed an amendment to the Rule Proposals that provides, in relevant part, that the Exchanges will conduct their own analysis concerning the elimination of the obvious error rules during Limit and Straddle States and agreed to provide the Securities and Exchange Commission (the "Commission") with relevant data to assess the impact of the Rule Proposals.

In consultation with Commission staff, the Exchanges have agreed to conduct additional analysis of the impact of Limit and Straddle States on liquidity and market quality in the options markets. Specifically, at least two months prior to the end of the Pilot Period, the Exchanges will provide to the Commission assessments relating to the impact of the operation of the obvious error rules during Limit and Straddle States as follows:

1. Evaluate the statistical and economic impact of Straddle States on liquidity and market quality in the options markets.
2. Assess whether the lack of obvious error rules in effect during the Straddle and Limit States are problematic.

Each month, the Exchanges will provide to the Commission and the public a dataset containing the data for each Straddle and Limit State in optionable stocks. Consistent with the Plan, such data will be

[1] See NYSE Arca Rules 6.87(a) and 6.87(d) and NYSE MKT Rules 975NY(a) and 975NY(d). As proposed, the Exchanges would retain the ability to review an electronic transaction in stock options on its own motion.

provided 30 days following month end.[2] For each stock that reaches a Straddle State, the number of options included in the dataset will be reduced by selecting options that meet the following conditions:

- The options are more than 20% in the money (strike price remains < 80% of last stock trade price for calls and strike price remains > 120% of last stock trade price for puts when the Straddle or Limit state is reached)
- Option has at least two trades during the Straddle or Limit state
- The top 10 options (as ranked by overall contract volume on that day) meeting the conditions above

For each of those options affected, each data record will contain the following information:

- Stock symbol, option symbol, time at the start of the Straddle or Limit State, an indicator for whether it is a Straddle or Limit State,

- For activity on the Exchanges:

    - executed volume, time-weighted quoted bid-ask spread, time-weighted average quoted depth at the bid, time-weighted average quoted depth at the offer,

    - high execution price, low execution price,

    - number of trades for which a request for review for obvious error was received during Straddle and Limit States,

    - an indicator variable for whether those options outlined above have a price change exceeding 30% during the underlying stock's Limit or Straddle state compared to the last available option price as reported by OPRA before the start of the Limit or Straddle state (1 if observe 30% and 0 otherwise). Another indicator variable for whether the option price within five minutes of the underlying stock leaving the Limit or Straddle State (or halt if applicable) is 30% away from the price before the start of the Limit or Straddle state.

The Exchanges will make available these data sets on its public website.

Sincerely,

Janet McGinness

cc: Heither Seidel, Associate Director, Division of Trading and Markets
David Dimitrious, Senior Special Counsel, Division of Trading and Markets

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[2] The Exchanges note that given the need to develop the reports for these datasets and that the Plan goes into effect on April 8, 2013, the initial monthly report may be delayed.