



October 1, 2019

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

Ms. Vanessa Countryman
Secretary
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

Re: SR-OCC-2019-007 (The Option Clearing Corporation's Capital Management Policy Proposal)


Dear Ms. Countryman:

Susquehanna International Group, LLP (collectively, with its affiliated and related entities, "SIG" or "we") appreciates the upcoming opportunity to speak with Chairman Clayton about the above-referenced rule filing submitted by the Options Clearing Corporation ("OCC") to the U.S. Securities and Exchange Commission. In general, the topics that we intend to discuss with Chairman Clayton are as follows:

- We remain concerned that the OCC could be monetized through a sale.
- We understand that OCC's bylaws limit the shareholders of OCC to registered national securities exchanges or national securities associations, but this leaves open the possibility of one of these organizations acquiring the OCC or a future change to OCC's bylaws to permit others to acquire the OCC.

We look forward to discussing these topics with Chairman Clayton.

Susquehanna International Group, LLP

By: 
Brian Sopinsky
General Counsel