

January 17, 2025

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

Re: File No. SR-OCC-2024-017 – Proposed Changes to OCC Fee Schedule

Dear Ms. Countryman:

Susquehanna International Group, LLP (“SIG”) strongly opposes the Options Clearing Corporation’s (“OCC”) proposed changes to its Fee Schedule, as outlined in the above-referenced fee filing. OCC has not established that the proposed fee changes are reasonable, and it has materially failed to comply with the Commission’s Staff Guidance on SRO Rule Filings Relating To Fees, dated May 21, 2019. Moreover, we believe the proposed changes are detrimental to the listed options market and its customers.

We intend to submit a more thorough supplement to this objection letter shortly. In the meantime, we urge the Commission to compare the OCC filing to the aforementioned Staff Guidance, which we believe will readily highlight the material failure of the OCC to meet the Commission’s expectations for rule filings relating to fees. Thank you.

Respectfully,



Richard J. McDonald