



EXECUTE SUCCESS™

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Via Electronic Mail

Ms. Elizabeth M. Murphy
Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549-1090
rule-comments@sec.gov

Re: Comment Letter on File No. SR-Phlx-2013-101

Dear Ms. Murphy:

Chicago Board Options Exchange, Incorporated (“CBOE” or “Exchange”) hereby submits comments on the proposed rule change of the NASDAQ OMX PHLX LLC (“Phlx”), rule filing number SR-Phlx-2013-101.¹ In its filing, Phlx proposes, among other things, to amend Phlx Rule 1012 (Series of Options Open for Trading) to expand the Short Term Option Program (“STOs” and “Program”) by increasing the current number of classes that may be selected by Phlx to participate in the Program from thirty option classes to fifty option classes.

CBOE supports the proposed expansion of the Program to include fifty option class selections per exchange on which STOs may be opened.² CBOE believes that this expansion will be well received by market participants because the Program is currently very popular and continues to grow. In particular, CBOE understands that there are several classes for which there is demand that they be added to the Program. This increase will allow the exchanges to respond to this unmet market demand for more classes to participate in the Program.

¹ See Securities Exchange Act Release No. 70682 (October 15, 2013), 78 FR 62809 (October 22, 2013)(SR-Phlx-2013-101).

² CBOE notes that it may also open STOs on classes selected by other exchanges under their respective programs. See CBOE Rules 5.5(d)(1) and 24.9(a)(2)(A)(i).

* * * * *

CBOE appreciates the opportunity to provide these comments. Should you require any further information, please contact me at (312) 786-7304.

Sincerely,

A handwritten signature in black ink that reads "Megan R. Malone". The signature is written in a cursive style with a large, prominent "M" and "R".

Megan R. Malone

Attorney

Chicago Board Options Exchange, Incorporated

cc: Tina Barry (SEC)
Heidi Pilpel (SEC)
Kathleen Gross (SEC)