

EXHIBIT 3**NASDAQ OMX PHLX LLC
SPY Position Limit Pilot Report
Reporting period December 1, 2013 to November 30, 2014****Reported On: December 15, 2014****General**

This Position Limit Report provides statistics on SPY options contracts traded, Open Interest, Volatility (Standard Deviation), and average position per account for two comparing time periods:

- December 1, 2011 to November 30, 2012 (hereafter referred as “Before”).
- December 2, 2013 to November 28, 2014 (hereafter referred as “After”)

Summary

Overall, when comparing the before and after periods (in Section 1 below), average Open Interest and the average number of contracts traded remained relatively unchanged, while the SPY volatility increased.

However, when examining trading activity with a given expiration month, it is noted that over both the December 2011 - November 2012 and December 2013 – November 2014 timeframe, the average open interest increased 13.6% and 11.5% respectively (see Section 2 below). In addition, the average number of contracts also increased as trading nears expiration. These continued increases are highly important as the number of strikes in SPY options become more widely available (i.e., exchanges were recent granted the ability to list seven (7) consecutive weekly expirations). The additional series allow the customer to establish positions in earlier expiries and roll these week after week, up and including the week of expiration.

The exchanges also looked at different complex strategy types and the relation to the average positions in accounts. Compared to before, the overall activity in complex strategy trades in SPY increased despite the number of complex spread strategies such as combos, straddles, and buy-writes declining or remaining the same. All other spread strategies increased in the last twelve months compared to before and was mainly driven by smaller sized orders. Spread trading was more prevalent even as the average position per account remains relatively unchanged. This may indicate that a greater number of trading accounts contributing to the increase in complex strategy trading, adding benefits such as higher liquidity in spread trading.

Section 1 – 12 month review on Open Interest, Contracts Traded, and SPY Price

December - November			
	Before	After	% Chg
Open Interest			
Average	19,823,724	19,056,218	-3.9%
Max	24,511,014	27,050,795	10.4%
Min	13,783,934	12,350,324	-10.4%
Contracts Traded			
Average	2,337,395	2,370,344	1.4%
Max	11,170,784	7,555,152	-32.4%
Min	982,662	1,030,744	4.9%
SPY Share Price			
Standard Dev.	5.8268	7.6800	31.8%
Max	\$147.24	\$207.64	41.0%
Min	\$120.29	\$174.17	44.8%

Compared to before the average Open Interest and the average number of contracts traded remained relatively unchanged as volatility in SPY share price increased.

Section 2 – Activity during Expiration

	Before			After		
	First 3 trading days in each month	Last 3 Trade Days Prior to Monthly Expiration	% Chg	First 3 trading days in each month	Last 3 Trade Days Prior to Monthly Expiration	% Chg
Open Interest						
Average	19,238,615	21,850,695	13.6%	18,330,063	20,440,194	11.5%
Contracts Traded						
Average	2,120,787	3,422,670	61.4%	2,266,453	2,956,598	30.5%
SPY Share Price						
Standard Dev.	6.1764	6.6379	7.5%	7.9922	7.5691	-5.3%

Average Open Interest and average number of contracts traded increased in both the before and after timeframe as trading nears expiration despite a decline in price volatility.

Section 3 – Complex Strategy Trade Types and Changes in Average Position Account

SPY Complex Average Trades per Day by Strategy Type Vs SPY Average Position per Account (million shares)

