U.S. Securities and Exchange Commission
Division of Trading and Markets

MEMORANDUM

TO: File Number 4-913

FROM: Staff of the Office of Analytics and Research, Division of Trading and Markets[1]

DATE: September 10, 2026

RE: Roundtable on Preparations for 24-Hour Trading Supporting Data

This memorandum provides empirical support to the Roundtable on Preparations for 24-Hour Trading by presenting current descriptive evidence on NMS stock activity during the overnight trading session. The memorandum begins with a brief overview of the methodological framework, including the modified trade-date convention, the construction of trading sessions, and the data sources employed. Following the methods section, Part I presents analyses of overnight and cross-session trading volume. Part II examines the characteristics of NMS stocks traded during the overnight session. Part III explores audit-trail-based measures of market-participant activity across trading sessions.

1 This memorandum is published in the authors' official capacities as staff of the Division of Trading and Markets, but does not necessarily reflect the views of the Commission, the Commissioners, or other members of the staff.

EXECUTIVE SUMMARY

Overnight trading in NMS stocks has continued to expand, though it remains a small but active component of overall NMS activity. In August 2026, the overnight session accounted for 0.9 percent of total NMS share volume on an average trade date, with average daily overnight volume decreasing 27 percent month-over-month and increasing 359 percent year-over-year to 144.6 million shares. NMS stock participation was both broad and consistent: an average of 4,208 NMS stocks traded each day; 8,335 traded at least once during the month; and 1,814 traded on every trade date. Despite this breadth, trading activity remained concentrated among a small number of stocks. On an average trade date, the ten most active NMS stocks accounted for 43.4 percent of overnight share volume, compared with 10.3 percent during regular trading hours. Participation by foreign account-holder types was notably elevated, contributing a larger share of activity than observed in other trading sessions.

GUIDE TO FIGURES AND TABLES

The main body of this memorandum consists of a structured sequence of figures and tables organized as outlined below.

Methods

- Trade Date Concept
- Trading Sessions
- Data Sources

Part I - Session Volume

- Historical Distribution of Overnight Session Volume as a Percentage of Total NMS Volume
- Current Volume Metrics by Trading Session, with Overnight ATS and Non-ATS Detail
- Distribution of Overnight Session Volume Levels by Ten-Minute Interval
- Cumulative Percentage of Overnight Session Volume by One-Minute Interval, with ATS and Non-ATS Detail

Part II - NMS Stocks Traded

- Historical Distribution of Participation Metrics for NMS Stocks in the Overnight Session
- Current Participation Metrics for NMS Stocks in the Overnight Session, with ATS and Non-ATS Detail
- Concentration of Volume Among Most Active NMS Stocks by Trading Session

Part III - Audit Trail Insights

- Quarter-Level Metrics for Broker-Dealer Counts Identified Through Trade Event Linkages
- Quarter-Level Metrics for Volume by Account Holder Type

METHODS

Trade Date Concept

For purposes of this memorandum, a modified trade-date convention is employed that defines each trade date as a continuous 24-hour interval spanning 8:00 p.m. Eastern Time (ET) of the prior calendar day through 8:00 p.m. ET of the current calendar day.

Trading Sessions

For purposes of this memorandum, trading activity is partitioned into five analytically defined trading sessions. These sessions are methodological constructs and do not purport to establish or interpret any operational trading phases. For all sessions, the timestamp used to assign an execution to a trading session is the execution-time timestamp reflecting when the transaction occurred, and not any subsequent publication, reporting, or processing timestamp.

Overnight Session

The Overnight Session includes all executions occurring between 8:00 p.m. ET on the calendar day preceding Regular Trading Hours and 4:00 a.m. ET on the calendar day on which Regular Trading Hours commence.

Early Extended Session

On calendar days in which Regular Trading Hours are observed, the Early Extended Session includes all executions occurring between 4:00 a.m. ET and the opening transaction that initiates Regular Trading Hours.

Regular Trading Hours

Regular Trading Hours encompass all executions occurring between 9:30 a.m. ET, beginning with the opening transaction, and 4:00 p.m. ET, concluding with the closing transaction.

Late Extended Session

On calendar days in which Regular Trading Hours are observed, the Late Extended Session covers all executions occurring between 4:00 p.m. ET immediately following the closing transaction and 8:00 p.m. ET.

Non-Business Day Session

The Non-Business Day Session includes all executions occurring on weekends and holidays.

Data Sources

For Parts I and II, executed volume is constructed using both Securities Information Processor ("SIP") trade messages and FINRA Trade Reporting Facility ("TRF") trade reports. SIP trade messages serve as the data source for executions occurring on an exchange, while TRF trade reports provide the data source for executions occurring otherwise than on an exchange. For this analysis, "TRF trade reports" refers to media-eligible trade reports in NMS stocks that were not reversed, cancelled, declined, or broken, as reported to the Consolidated Audit Trail ("CAT"). This set expressly includes trade reports that were designated for publication but subsequently suppressed from public dissemination[2]. SIP trade messages are reconciled for corrections, cancellations, and late reporting. The data starts July 01, 2021 and ends August 31, 2026.

For Part III, data were aggregated from CAT reported events in NMS stocks occurring during the second quarter of 2026. Each reported trade event was linked to its originating order using the CAT lifecycle identifier. Reported trade events that could not be reliably linked to an originating order—because the lifecycle was incomplete—or where the lifecycle was long-lived[3] were excluded from the analysis.

2 When a member firm reports a trade to a TRF, the facility determines whether the trade is a tape-eligible report for submission to the appropriate SIP, and such reports are ordinarily transmitted for public dissemination. Certain categories of trades, however, are suppressed—meaning they are reported to the TRF but not forwarded to the SIP—including Rule 144A restricted equity securities, T+365 trades, and trades executed on a non-business day. Notably, Sunday evenings between 8:00 p.m. ET and midnight, during which the overnight ATS session operates, are deemed a non-business day. In all such cases, firms report the trades to the TRF, but the TRF withholds SIP submission, resulting in no public dissemination.

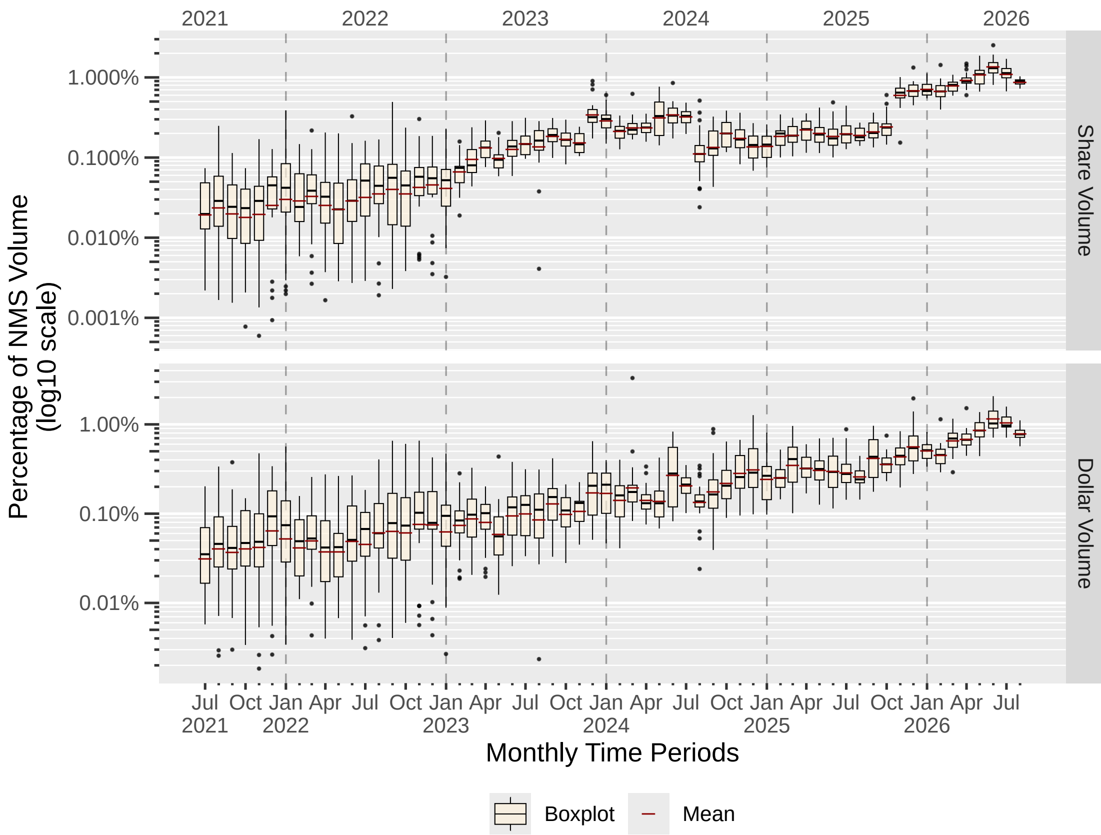
3 This analysis includes lifecycles where the trade event occurred on the same or following trade date as the originating order.

PART I - SESSION VOLUME

Historical Distribution of Overnight Session Volume as a Percentage of Total NMS Volume

To assess the growth of overnight trading activity relative to NMS volume, the daily ratio of overnight session volume to total NMS volume is examined using monthly boxplots spanning the past five years. The ratio is analyzed in both share-volume and dollar-volume terms. This visualization highlights changes in central tendency, shifts in the interquartile range, and the prevalence of extreme outliers across months, providing a clear view of how overnight participation evolves over time.

FIGURE 1. **Historical Distribution of Overnight Session Volume as a Percentage of Total NMS Volume**



Showing a time-series boxplot, with one boxplot per month summarizing daily observations. Each boxplot visualizes the distribution of overnight session volume using Tukey's box-and-whisker method, where five statistics are calculated from the data. Specifically, a central line marks the median (50th percentile), while the lower and upper boundaries of the box represent the 25th (Q_1) and 75th (Q_3) percentiles, respectively. The height of this box defines the Interquartile Range (IQR = Q_3 - Q_1). Whiskers then extend from the box to the furthest data points that fall within (1.5 x IQR) of the hinges, and any remaining data points beyond these boundaries are plotted individually as outliers.

Source: SIP; TRF; author's calculations
Data starts July 01, 2021 and ends August 31, 2026.

Takeaway

On average, per trade date in the month of August 2026, the overnight session accounted for:

- **0.9 percent** of total NMS share volume.
- **0.8 percent** of total NMS dollar volume.

Current Volume Metrics by Trading Session, with Overnight ATS and Non-ATS Detail

To anchor the patterns shown in the overnight boxplots in actual trading levels and to extend the view across all trading sessions, the next table presents average daily share volume ("ADV") and dollar value traded ("ADVT") for August 2026, together with month-over-month and year-over-year comparisons using August 2026 as the reference point. In addition to the session-level totals, the table also reports volume metrics for venue subsets within each session, grouping exchange activity, ATS activity, and Non-ATS activity into their respective totals, and providing individual breakouts for each overnight ATS operator to show how activity varies across venues. To complement these snapshots with longer-horizon perspective, a five-year sparkline is included to show the underlying trend at a glance.

TABLE 1: Current Volume Metrics by Trading Session, with Overnight ATS and Non-ATS Detail

Session	ADV August 2026	ADV M/M[1]	ADV Y/Y[2]	ADV Five-Year Trend[3]	ADVT August 2026	ADVT M/M[1]	ADVT Y/Y[2]	ADVT Five-Year Trend[3]
Overnight								
Overall	144.6M	−27%	+359%		$7.4B	−32%	+249%	
ATS[4]	111.5M	−24%	+369%		$5.2B	−32%	+301%	
BOATS[5]	93.7M	−21%	+322%		$4.2B	−32%	+250%	
Bruce ATS[6]	12.6M	−33%	+103K%		$707.7M	−27%	+73K%	
IBKR Eos ATS[7]	3.1M	−46%	+99%		$203.7M	−33%	+119%	
MOON ATS[8]	2.0M	−49%	+68K%		$89.3M	−46%	+24K%	
Non-ATS[9]	33.1M	−36%	+327%		$2.2B	−34%	+167%	
Non-ATS ".W" Modifier[10]	8.6M	−27%	+18%		$1.1B	−35%	+44%	
Early Extended								
Overall	1.1B	+9%	+27%		$23.6B	−1%	+55%	
Exchange[11]	609.3M	+5%	−4%		$14.8B	−9%	+50%	
ATS[4]	656.8K	+13%	+4K%		$50.6M	+8%	+4K%	
Non-ATS[9]	536.7M	+15%	+99%		$8.7B	+19%	+63%	
Regular Trading Hours								
Overall	14.3B	−8%	−3%		$841.3B	−10%	+15%	
Exchange[11]	7.3B	−8%	+0%		$469.8B	−11%	+11%	
Opening Trades	115.7M	0%	−2%		$8.7B	−5%	+28%	
Closing Trades	1.1B	−5%	+25%		$93.7B	−7%	+50%	
ATS[4]	2.3B	−6%	+7%		$175.2B	−11%	+30%	
Non-ATS[9]	4.7B	−8%	−12%		$196.3B	−7%	+13%	
Late Extended								
Overall	897.9M	+6%	+24%		$66.4B	+6%	+55%	
Exchange[11]	199.1M	+4%	+16%		$8.1B	−10%	+38%	
ATS[4]	19.3M	−8%	+32%		$4.0B	−14%	+18%	
Non-ATS[9]	679.5M	+7%	+27%		$54.4B	+10%	+62%	
Non-business day								
Overall	6.8M	+82%	+117%		$891.5M	+15%	+108%	

[1] "M/M" reflects the percentage change relative to the immediately preceding calendar month.
[2] "Y/Y" reflects the percentage change relative to the same calendar month in the prior year.
[3] Month-over-month volume between July 2021 and August 2026.
[4] ATS volume for the session.
[5] ATS MPID: BLUE; BD operator: Blue Ocean ATS, LLC; hours of operation: 8 PM to 4 AM.
[6] ATS MPID: BOSS; BD operator: Bruce Markets LLC; hours of operation: 8 PM to 4 AM.
[7] ATS MPID: IEOS; BD operator: INTERACTIVE BROKERS LLC; hours of operation: 8 PM to 3:50 AM.
[8] ATS MPID: MOON; BD operator: OTC Link LLC; hours of operation: 8 PM to 4 AM.
[9] Non-ATS volume for the session.
[10] Subset of Non-ATS volume from trade reports using the '.W' modifier.
[11] Exchange volume for the session.

Source: SIP; TRF; author's calculations
Data starts July 01, 2021 and ends August 31, 2026.

Takeaway

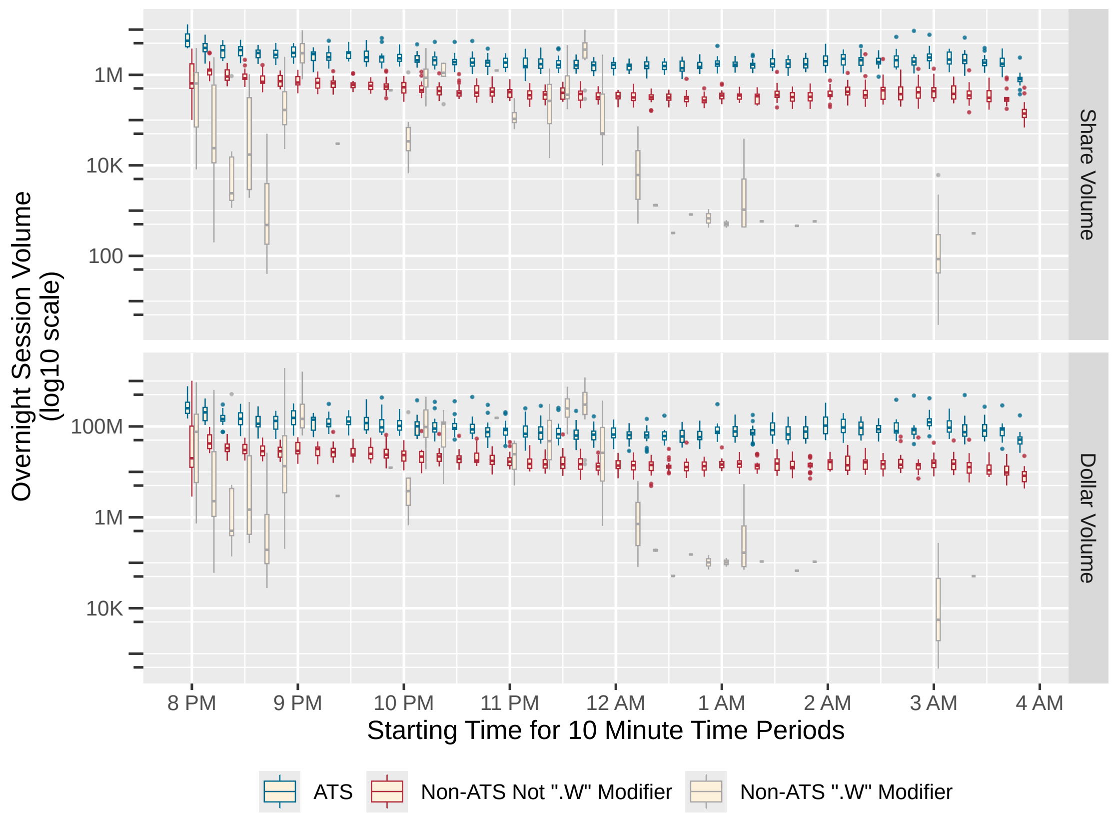
During the month of August 2026, for the overnight session:

- **ADV** decreased **27 percent M/M** (and increased **359 percent Y/Y**) to **144.6 million shares**.
- **ADVT** decreased **32 percent M/M** (and increased **249 percent Y/Y**) to **7.4 billion dollars**.

Distribution of Overnight Session Volume Levels by Ten-Minute Interval

To extend the summary of average daily trading activity across sessions, the next figure provides a view of how trading volume develops within the overnight session by grouping executions into ten-minute intervals for all trading days in August 2026. The resulting daily observations for each interval are displayed in a time-series boxplot, with ATS and Non-ATS activity shown separately to highlight venue-specific differences in overnight trading volume. Taken together, these boxplots highlight intraday patterns and day-to-day variation in overnight volume.

FIGURE 2. **Distribution of Overnight Session Volume Levels by Ten-Minute Interval**



Showing a time-series boxplot, with one boxplot per 10-minute time period summarizing daily observations. Each boxplot visualizes the distribution of overnight session volume using Tukey's box-and-whisker method, where five statistics are calculated from the data. Specifically, a central line marks the median (50th percentile), while the lower and upper boundaries of the box represent the 25th (Q_1) and 75th (Q_3) percentiles, respectively. The height of this box defines the Interquartile Range (IQR = Q_3 - Q_1). Whiskers then extend from the box to the furthest data points that fall within (1.5 x IQR) of the hinges, and any remaining data points beyond these boundaries are plotted individually as outliers.

Source: SIP; TRF; author's calculations
Data from August 2026.

Takeaway

During the month of August 2026, for the overnight session:

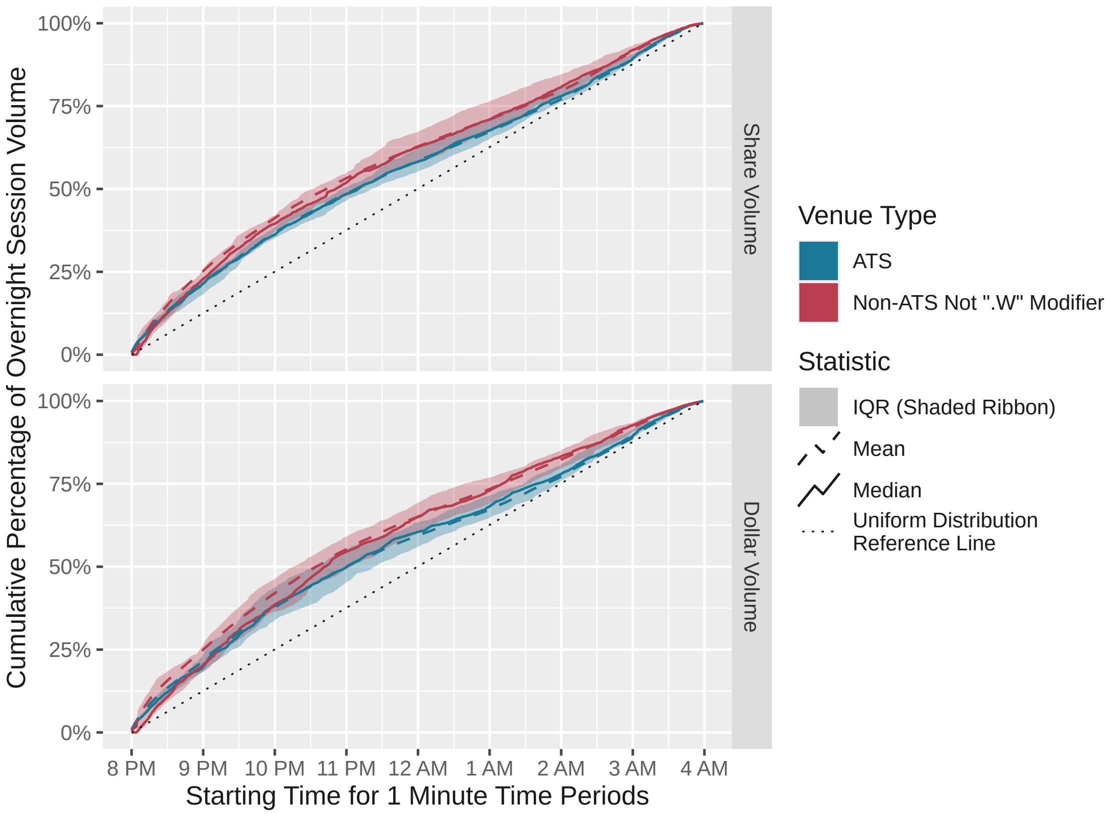
- **Non-ATS MPID batch reports** using the ".W" modifier[4] account for the pronounced volume spikes observed around **9:00 PM** and **11:40 PM**.
- **Aside from batch reporting effects**, overnight session volume does not display the familiar U-shaped pattern seen during regular trading hours. Instead, it follows a more **subtle S-shape**, with **higher activity early in the session and lighter activity toward the end**.

4 The .W modifier is used when a trade is executed at a price based on an average weighting or another special pricing formula, as described in FINRA Rules 6380A(a)(5)(E) and 6380B(a)(5)(E). Firms typically apply the .W modifier to overnight batch transactions—such as liquidations of orphaned fractional share positions priced off the prior day's official closing price—and to ETF NAV trades executed using a net asset value published after the TRFs closed the previous business day.

Cumulative Percentage of Overnight Session Volume by One-Minute Interval, with ATS and Non-ATS Detail

While the intraday boxplot summarizes the distribution of ten-minute overnight volumes across days and highlights venue-specific differences between ATS and Non-ATS activity, the next figure re-expresses the same underlying data to show how volume accumulates through the session. Presenting the data in cumulative form makes it easier to observe differences in execution pace and timing across venues—insights that are less directly apparent from the distributional view alone. To complement the preceding ten-minute boxplots, the overnight trading data are regrouped at a one-minute frequency and displayed as a normalized cumulative time series, with ATS and Non-ATS activity shown separately to highlight venue-specific differences in volume velocity, timing, and session-level consistency.

FIGURE 3. **Cumulative Percentage of Overnight Session Volume by One-Minute Interval, with ATS and Non-ATS Detail**



Showing a normalized cumulative time series of session volume by 1 minute time periods for the overnight session. The cumulative sum of overnight session volume is computed chronologically across 1 minute time periods independently for each trade date within a month-long observation window. Each daily trajectory is normalized against its daily total session volume to scale the vertical domain from 0% to 100%. To characterize systemic behavior across the entire month, the daily normalized trajectories are summarized at each time step: the curves map the mean (dashed line) and median (solid line) cumulative paths, while the shaded ribbon delineates the Interquartile Range (IQR), visually quantifying day-to-day variance, and the predictability of the cumulative session volume over time.

Source: SIP; TRF; author's calculations
Data from August 2026.

Takeaway

On a typical trade date during August 2026, in the overnight session:

- **Between 8 PM and 9 PM—**the planned one-hour SIP/TRF maintenance window[5]**,—21.2 percent** of ATS share volume (**19.3 percent** of ATS dollar volume) was executed.
- **Between 3 AM and 4 AM**, roughly **10.6 percent** of ATS share volume (**10.5 percent** of ATS dollar volume) was executed.

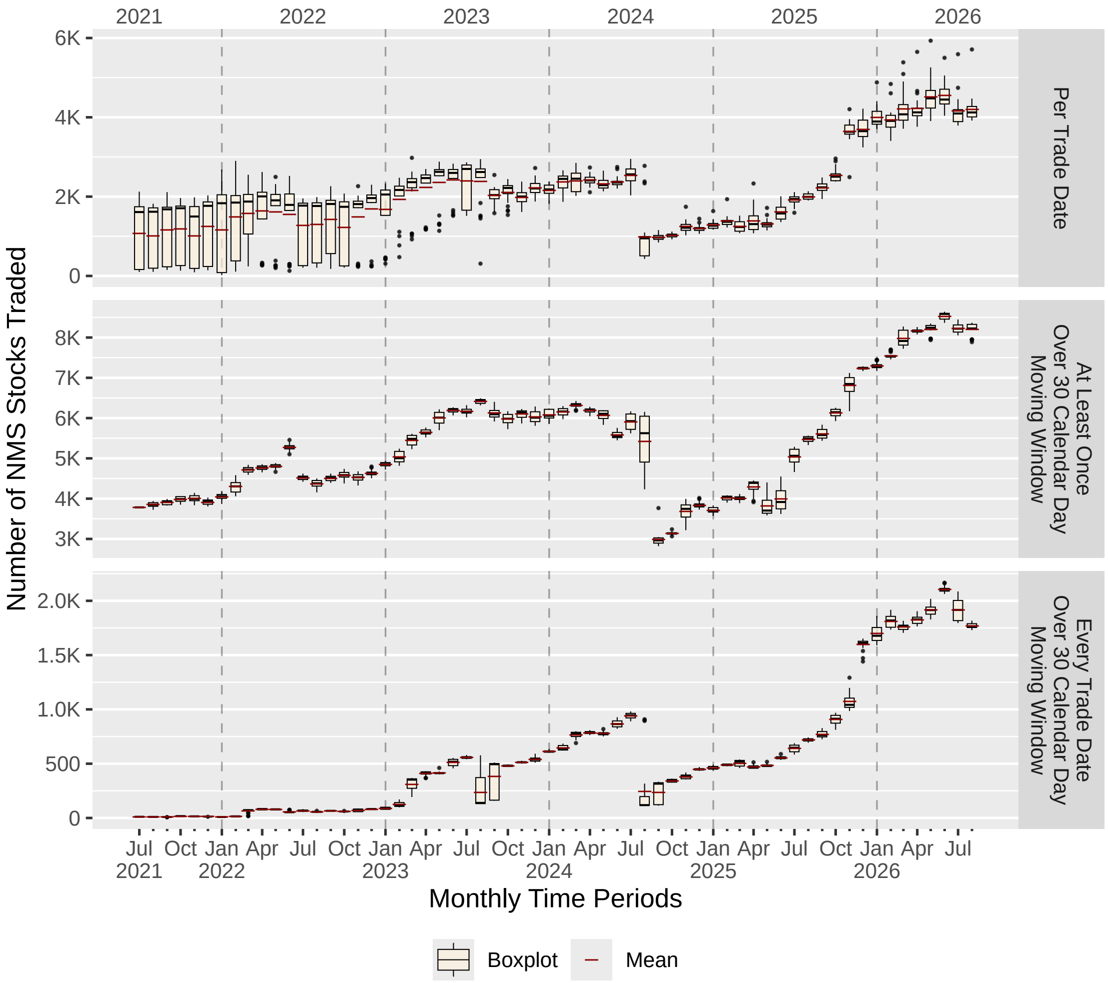
5 The Operating Committees of the Equity Data Plans expect that on December 6, 2026, the Securities Information Processors (CTA and UTP SIPs) will operate from 9:00 p.m. ET Sunday through 8:00 p.m. ET Friday, pausing daily Monday through Thursday from 8:00 p.m. to 9:00 p.m. ET for technical maintenance, as provided in the CTA/UTP Plan amendments (https://www.sec.gov/files/rules/sro/nms/2026/34-105779.pdf) and (https://www.sec.gov/files/rules/sro/nms/2026/34-105780.pdf). As outlined in FINRA's proposed rule change, FINRA intends to align the overnight hours of FINRA's TRFs to be during the same time period as the SIPs and to follow the same implementation date as CTA/UTP Plan amendments (https://www.sec.gov/files/rules/sro/finra/2026/34-105922.pdf).

PART II - NMS STOCKS TRADED

Historical Distribution of Participation Metrics for NMS Stocks in the Overnight Session

Having examined both the level and intraday progression of overnight trading activity in Part I, the analysis now turns to the breadth of participation in NMS stocks during the overnight session. To provide a long-horizon view of how many NMS stocks are traded and how consistently they appear in overnight activity, the next figure presents a panel of time-series boxplots showing three related measures over the past five years: (1) the number of NMS stocks traded each day; (2) the number traded at least once within a 30-calendar-day window; and (3) the number traded on every trade date within that same window. Together, these measures provide a view of both the daily and longitudinal consistency of overnight participation across the NMS stock universe.

FIGURE 4. **Historical Distribution of Participation Metrics for NMS Stocks in the Overnight Session**



Showing a time-series boxplot, with one boxplot per month summarizing daily observations. Each boxplot visualizes the distribution of the unique number of NMS stocks traded during the overnight session using Tukey's box-and-whisker method, where five statistics are calculated from the data. Specifically, a central line marks the median (50th percentile), while the lower and upper boundaries of the box represent the 25th (Q_1) and 75th (Q_3) percentiles, respectively. The height of this box defines the Interquartile Range (IQR = Q_3 - Q_1). Whiskers then extend from the box to the furthest data points that fall within (1.5 x IQR) of the hinges, and any remaining data points beyond these boundaries are plotted individually as outliers.

Source: SIP; TRF; author's calculations
Data starts July 01, 2021 and ends August 31, 2026.

Takeaway

During August 2026, in the overnight session:

- **An average of 4,208 NMS stocks** recorded at least one trade per trade date.
- **A total of 8,335 NMS stocks** recorded at least one trade at some point during the month.
- **A set of 1,814 NMS stocks** recorded at least one trade on every trade date in the month.

Current Participation Metrics for NMS Stocks in the Overnight Session, with ATS and Non-ATS Detail

Building on the five-year boxplot, the next table focuses on the most recent segment of the series—August 2026—and augments the view by disaggregating the overnight session across individual ATS and a combined Non-ATS category. Following the five-year time-series figures, this focused subset of current overnight-session information is presented together with the underlying values for August 2026 and the corresponding month-over-month and year-over-year changes. To provide additional context on how these measures have evolved over time, a sparkline is included to illustrate the broader trend.

TABLE 2: Current Participation Metrics for NMS Stocks in the Overnight Session, with ATS and Non-ATS Detail

	Number of NMS Stocks			
Overnight Session	August 2026	M/M[1]	Y/Y[2]	Five-Year Trend[3]
Average Per Trade Date				
Overall	4.2K	+1%	+110%	
ATS[4]	3.4K	0%	+71%	
BOATS[5]	3.2K	−1%	+63%	
Bruce ATS[6]	1.8K	+2%	+15K%	
IBKR Eos ATS[7]	675.0	+3%	+4%	
MOON ATS[8]	683.5	−5%	+3K%	
Non-ATS[9]	3.4K	+4%	+1K%	
At Least Once Over 30 Calendar Day Moving Window				
Overall	8.3K	+2%	+50%	
ATS[4]	7.0K	0%	+31%	
BOATS[5]	6.8K	0%	+28%	
Bruce ATS[6]	4.9K	+3%	+10K%	
IBKR Eos ATS[7]	2.3K	+4%	−14%	
MOON ATS[8]	2.6K	−3%	+2K%	
Non-ATS[9]	7.3K	+3%	+621%	
Every Trade Date Over 30 Calendar Day Moving Window				
Overall	1.8K	+1%	+150%	
ATS[4]	1.3K	+2%	+85%	
BOATS[5]	1.2K	+2%	+66%	
Bruce ATS[6]	638.0	+3%	[10] 0→	
IBKR Eos ATS[7]	167.0	0%	+37%	
MOON ATS[8]	148.0	+32%	[10] 0→	
Non-ATS[9]	1.2K	+1%	+5K%	

[1] "M/M" reflects the percentage change relative to the immediately preceding calendar month.
[2] "Y/Y" reflects the percentage change relative to the same calendar month in the prior year.
[3] Month-over-month between July 2021 and August 2026.
[4] NMS stocks traded on ATSs.
[5] ATS MPID: BLUE; BD operator: Blue Ocean ATS, LLC; hours of operation: 8 PM to 4 AM.
[6] ATS MPID: BOSS; BD operator: Bruce Markets LLC; hours of operation: 8 PM to 4 AM.
[7] ATS MPID: IEOS; BD operator: INTERACTIVE BROKERS LLC; hours of operation: 8 PM to 3:50 AM.
[8] ATS MPID: MOON; BD operator: OTC Link LLC; hours of operation: 8 PM to 4 AM.
[9] NMS stocks traded otherwise than on an exchange or ATS.
[10] Value cannot be calculated because the baseline time period was 0.

This table reports three complementary measures of overnight NMS-stock participation for August 2026—daily breadth, 30-day window breadth, and 30-day window consistency—each shown separately for ATS venues and for the combined Non-ATS category. Month-over-month and year-over-year changes are provided relative to August 2026.

Source: SIP; TRF; author's calculations
Data starts July 01, 2021 and ends August 31, 2026.

Takeaway

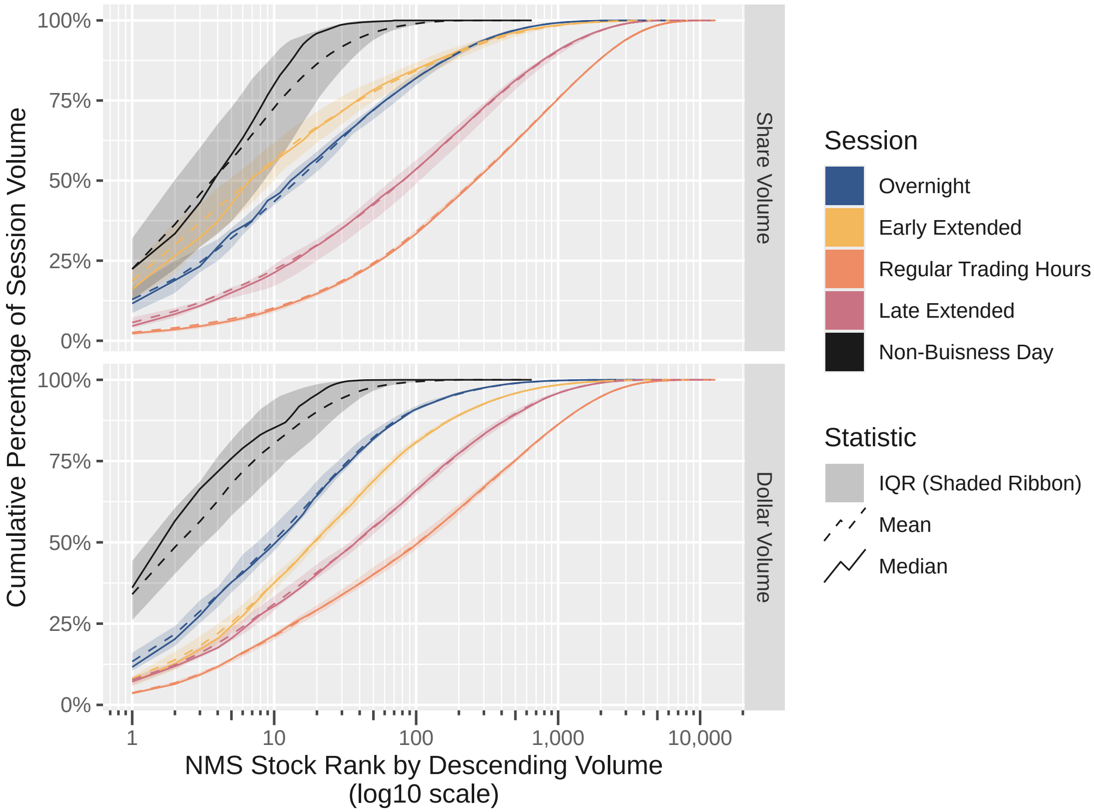
For the Overnight Session in August 2026, across all three participation measures:

- **Month-over-month changes were small and relatively stable**, both overall and within the ATS and Non-ATS breakout.
- **Year-over-year changes showed growth within each venue**, with **differences in the within-venue proportion of that growth between ATSs and the Non-ATS combined category**.

Concentration of Volume Among Most Active NMS Stocks by Trading Session

Having first established the breadth and day-to-day consistency of overnight trading across the NMS stock universe, this section examines how trading activity is distributed across individual NMS stocks within each session. The figure and accompanying table provide complementary views of concentration patterns during August 2026. The figure displays normalized Pareto cumulative curves that show how session-level trading volume accumulates across the most active stocks, with the set of top-volume names defined separately for each trading session. The table translates these curves into concrete thresholds by reporting how many of the most active stocks are needed to reach key cumulative share-volume and dollar-volume levels. Together, these materials highlight how concentration varies across overnight, extended-hours, and regular trading sessions. For example, when reading the figure, an x-value of 100 indicates that the top 100 overnight names account for 82.0 percent of overnight share volume, compared with 34.0 percent during regular trading hours—illustrating how markedly concentration levels differ between sessions.

FIGURE 5. **Concentration of Volume Among Most Active NMS Stocks by Trading Session**



Showing a normalized Pareto cumulative curve plotting NMS stocks ranked in descending order of session volume against their complementary cumulative distribution function ("CCDF") to illustrate the concentration of total session volume. The Pareto cumulative sum is computed for each trade date, and from each resulting distribution, three summary statistics are calculated and plotted together on a single relative axis scaled from 0% to 100%: the mean tracks the overall center of gravity and shifts in response to extreme high-volume days; the median represents the exact midpoint to isolate typical daily volume independent of outliers; and the Interquartile Range ("IQR") captures the variability of the middle 50% of the data, serving as an indicator of daily predictability.

Source: SIP; TRF; author's calculations
Data from August 2026.

TABLE 3: Concentration of Volume Among Most Active NMS Stocks by Trading Session

Session	Cumulative Percentage of Volume 25%	50%	75%	100%
Share Volume				
Overnight	4	15	61	5,711
Early Extended	2	7	40	8,185
Regular Trading Hours	53	256	965	12,831
Late Extended	14	81	347	11,875
Dollar Volume				
Overnight	3	10	34	5,711
Early Extended	5	20	70	8,185
Regular Trading Hours	15	103	494	12,831
Late Extended	7	38	174	11,875

This table shows how many of the most active NMS stocks are needed to reach different cumulative volume levels when read from the mean concentration curves of Figure 5, which reflects the average pattern across all trading days in August 2026.

Source: SIP; TRF; author's calculations
Data from August 2026.

Takeaway

In August 2026, on an average trade date, the session-specific set of the ten most active NMS stocks[6] accounted for:

- **43.4 percent** of overnight session share volume (**50.7 percen**t of dollar volume).
- **10.3 percent** of regular trading-hours share volume (**21.1 percent** of dollar volume).

6 The composition of the ten most active NMS stocks differs materially between the overnight session and regular trading hours. To assess this difference, the daily intersection between the session specific sets of the ten most active names was evaluated for August 2026. When ranked by dollar volume, the two sets shared an average of approximately four names per day, with daily values ranging from three to seven. When ranked by share volume, the intersection was smaller, averaging roughly two to three names per day, with a range of zero to four.

PART III - AUDIT TRAIL INSIGHTS

Quarter-Level Metrics for Broker-Dealer Counts Identified Through Trade Event Linkages

Having examined how trading activity is distributed across NMS stocks within each session, the analysis now turns from volume patterns to the underlying order lifecycles that give rise to reported trade events. To provide a baseline view of broker-dealers' ("BDs") activity across trading sessions, the next table summarizes the unique counts of broker-dealers identified as the executing party on reported trade events and the unique counts of broker-dealers that reported originating orders linked to those events. Each reported trade event is connected to its originating order through the order lifecycle, allowing the table to distinguish between BDs that execute trades and BDs that originate the orders that lead to those trades.

TABLE 4: **Quarter-Level Metrics for Broker-Dealer Counts Identified Through Trade Event Linkages**

	Broker Dealers	
Session	Originating	Executing
Overall	1,105	336
Overnight	118	67
Early Extended	557	198
Regular Trading Hours	1,104	331
Late Extended	587	236

This table shows the unique counts of BDs identified as the executing party on reported trade events and the unique counts of BDs that reported originating orders linked to trade events in NMS stocks, based on quarterly data.

Source: CAT; author's calculations
Data from 2nd quarter 2026.

Takeaway

During the second quarter of 2026, in the overnight session:

- **67 broker-dealers** were identified as the executing party on reported trade events occurring during the overnight session.
- **118 broker-dealers** reported originating an order that was subsequently linked to a trade event occurring during the overnight session.

Quarter-Level Metrics for Volume by Account Holder Type[7]

The following table shows the proportion of volume during each session by account holder type. This proportional breakdown supports comparison of participation across sessions and highlights differences in account type contributions over the quarter.

TABLE 5: Quarter-Level Metrics for Volume by Account Holder Type

	Account Holder Type				
Session	Foreign	Individual	Institutional	Market-Maker	Proprietary
Share Volume					
Overnight	37%	9%	7%	19%	29%
Early Extended	28%	26%	7%	17%	21%
Regular Trading Hours	10%	19%	30%	23%	18%
Late Extended	15%	21%	32%	7%	25%
Dollar Volume					
Overnight	24%	17%	14%	29%	16%
Early Extended	21%	22%	20%	24%	14%
Regular Trading Hours	8%	12%	35%	25%	18%
Late Extended	12%	7%	46%	11%	24%

This table reports the proportion of each trading session's quarterly share and dollar volume attributable to each account holder type, calculated as each account holder type's share of total session volume. Because each trade event is attributed to both buyer and seller account holder types, session volume is double-counted for this proportional breakdown. The values are constructed from aggregated quarterly data.

Source: CAT; author's calculations
Data from 2nd quarter 2026.

7 In this memo, the term "account holder type" refers to the CAT accountHolderType field, which identifies the type of beneficial owner or account associated with an equity order or allocation, as specified in the CAT Reporting Technical Specifications for Industry Members (Version 4.2.0r1, June 26, 2026), available at https://www.catnmsplan.com/sites/default/files/2026-06/06.26.26_CAT_Reporting_Technical_Specifications_for_Industry_Members_v4.2.0r1_CLEAN.pdf. According to Appendix G, this field may reflect the beneficial owner of the account for which an order is received or originated, the account against which a customer or client order is filled, or the account associated with a firmDesignatedID. For purposes of this table, only five account types are included: Institutional (an institutional account as defined in FINRA Rule 4512(c)); Individual (an account that does not meet the definition of "institution" under FINRA Rule 4512(c) and is not a proprietary account); Foreign (a non-broker-dealer foreign affiliate or non-reporting foreign broker-dealer); Market Making (an account used in connection with market-making activity); and Proprietary (a proprietary trading account of the firm). Other accountHolderType categories defined in the CAT specification—such as employee, error, and firm agency average price accounts—are excluded from this table because they represent a negligible share of total quarterly equity volume.

Takeaway

- **Foreign accounts contribute a large share of overnight trading activity**, making up roughly **37 percent of overnight share volume** and **24 percent of overnight dollar volume**.
- **Foreign participation is at its highest proportion overnight**, with materially lower proportions in the early extended, regular hours, and late extended sessions.