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March 13, 2015

By Electronic Mail and Hand Delivery

Mr. Brent J. Fields
Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

Re: File No. SR-OCC-2015-02

Dear Sir:

Susquehanna International Group, LLP (collectively, and with its affiliated and related entities, "SIG" or "we") is writing to provide a notice of intention to petition for review by the full Commission of the Securities and Exchange Commission ("SEC") of proposed rule change SR-OCC-2015-02 ("Proposal") of the Options Clearing Corporation ("OCC") that was approved by the Division of Trading and Markets ("Division") pursuant to delegated authority.¹ We submitted several comment letters to the SEC, either as part of a group of six options market makers or by ourselves, that opposed the Proposal during its public comment period. We explained in great detail in those letters why the Proposal is inconsistent with the Securities Exchange Act of 1934 ("Exchange Act") and should be disapproved. Several other entities also submitted comment letters to the SEC opposing the Proposal as violative of the Exchange Act. Nevertheless, the Division approved the Proposal by delegated authority.

The SEC's rules of practice, in Section 201.430,² allows any person aggrieved by an action made by the Division pursuant to delegated authority to seek Commission review of the approval by submitting a written notice of intention to petition for review, and then within five subsequent days, file a petition for review. SIG is an options market maker in numerous options classes and would be seriously harmed by the Proposal. In addition, we believe that the Proposal will degrade the quality and competitiveness of the options markets. As noted above, we commented extensively on why the Proposal is inconsistent with the Exchange Act. Thus, we are aggrieved by the Division's approval by delegated authority of the Proposal and will file a petition for Commission review of the approval. This letter provides a notice of our intention to file such a petition. We will provide a clear and concise statement of the issues to be reviewed and the reasons why the review is appropriate when we file our petition.

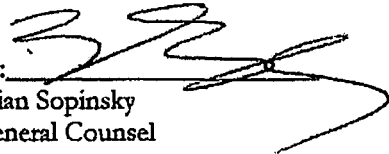
¹ Securities Exchange Act Release No. 74452 (March 6, 2015).

² 17 CFR 201.430.

If you have any questions, please call me at 610-617-2725.

Very Truly Yours,

Susquehanna International Group, LLP

By: 
Brian Sopinsky
General Counsel

CC: Honorable Mary Jo White
Honorable Luis A. Aguilar
Honorable Daniel M. Gallagher
Honorable Michael Piwowar
Honorable Kara M. Stein