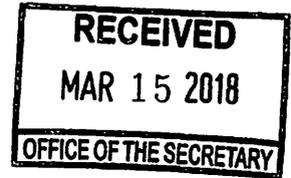


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



_____)
In the Matter of the:) File No. SR-BatsBZX-2017-34
)
Cboe BZX Exchange, Inc.)
)
For an Order Granting Approval of)
)
Proposed Rule Change to Introduce)
Cboe Market Close, a Closing Match)
Process for Non-BZX Listed)
Securities under New Exchange Rule)
11.28)
_____)

**RESPONSE FROM CBOE BZX EXCHANGE, INC. TO NYSE'S AND NASDAQ'S
REQUEST FOR AN EXTENSION OF TIME TO FILE STATEMENTS IN OPPOSITION
OF THE ACTION MADE PURSUANT TO DELEGATED AUTHORITY**

On March 1, 2018, the Securities and Exchange Commission (“Commission”) granted the petition for review of The Nasdaq Stock Market LLC (“Nasdaq”) and NYSE Group, Inc. (“NYSE”) regarding an order (the “Order”) by the staff of the Division of Trading and Markets approving, pursuant to delegated authority, a proposed rule change of Cboe BZX Exchange, Inc. (“BZX”) to introduce Cboe Market Close. The Commission’s order set a deadline of March 22, 2108 for the submission of statements in support of or in opposition to the action made pursuant to delegated authority. On March 9, 2018, Nasdaq and the NYSE submitted a motion requesting a three-week extension of time to and including April 12, 2018 for the submission of their statements in opposition to the staff’s order approving Cboe Market Close, as well as submission of statements regarding the Order by any other party or person.

BZX does not object to the NYSE's and Nasdaq's extension request as long as all parties' and other persons' statements regarding the Order are due at the same time. However, with respect to NYSE's and Nasdaq's statement that they need additional time in order to obtain supporting empirical data and analyses, we note that the proposed rule change was published for comment by the Commission on May 16, 2017¹ and that the NYSE and Nasdaq had the benefit of a full 240-day review period to submit data and analyses they thought would prove helpful to the staff in their consideration of Cboe Market Close. During that time, both NYSE and Nasdaq submitted numerous comment letters that included various data sets as well as analyses of that data.² The NYSE also submitted a separate study for the staff's consideration.³

Respectfully submitted,



Patrick Sexton
Executive Vice President
& General Counsel
Cboe Global Markets, Inc.
400 South LaSalle Street
Chicago, IL 60605

Dated March 14, 2018

¹ See Securities Exchange Act Release No. 80683 (May 16, 2017), 82 FR 23320 (May 22, 2017) (SR-BatsBZX-2017-34).

² See letters to Mr. Brent J. Fields, Secretary, Commission, from Elizabeth K. King, General Counsel and Corporate Secretary, New York Stock Exchange, Inc., dated January 12, 2017, November 3, 2017, August 9, 2017, and June 13, 2017; from Edward S. Knight, Executive Vice President and General Counsel, Nasdaq, Inc., dated September 18, 2017 and June 12, 2017; and Jeffrey S. Davis, Vice President and Deputy General Counsel, Nasdaq, Inc. dated December 21, 2017.

³ See *Proposed Rule to Introduce Bats Market Close, Assessment of DERA Study Published on December 1, 2017*, by D. Timothy McCormick, Ph.D., dated January 11, 2018. This document was submitted in conjunction with NYSE's January 12, 2017 letter.

CERTIFICATE OF SERVICE

I, Patrick Sexton, Executive Vice President and General Counsel for Cboe Global Markets, Inc., hereby certify that on March 14, 2018, I served copies of the attached Response from Cboe BZX Exchange, Inc. to NYSE's and Nasdaq's Request for an Extension of Time to File Statements in Opposition of the Action Made Pursuant to Delegated Authority as indicated below:

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Secretary
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Dated: March 14, 2018