



Via Portal Submission

March 2, 2026  
MIAX Futures DCM Submission No. 26-7

Mr. Christopher Kirkpatrick  
Secretary of the Commission  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street NW  
Washington, DC 20581

**RE: CFTC Regulations 40.6(a); Issuance of Large Trader Reporting and Ownership & Control Reporting Advisory Regarding MIAX Futures Rule 2.3.5.**

Dear Mr. Kirkpatrick:

Pursuant to Commodity Exchange Act (“CEAct”) Section 5c and Commodity Futures Trading Commission (“CFTC” or “Commission”) Regulation 40.6(a), the MIAX Futures Exchange, LLC (“MIAX Futures” or “Exchange”) hereby certifies that the Large Trader Reporting and Ownership & Control Reporting Advisory Regarding MIAX Futures Rule 2.3.5. (“Advisory”) as set forth in Exhibit A complies with the CEAct and the Commission regulations promulgated thereunder. MIAX Futures further certifies that the submission and Advisory have been posted on the Exchange website at the following link: <https://www.miaxglobal.com/markets/futures/miax-futures/rule-filings>.

### **Overview of Advisory**

MIAX Futures Rule 2.3.5. requires Clearing Members, and FCMs and Foreign Brokers with omnibus accounts to transmit to the Exchange a daily large trader report for reportable accounts, as well as certain ownership and control reports. The Advisory provides additional specificity and practical guidance regarding such reporting obligations. In particular, the Advisory details who is required to report, the types of accounts and positions that are subject to reporting, the specific information that must be included in each report, and the operational processes for submitting required data to the Exchange. The Advisory intends to promote consistent interpretation of Rule 2.3.5. and assist Clearing Members, FCMs, and Foreign Brokers in complying with their reporting obligations in an accurate and timely manner.<sup>1</sup>

### **DCM Core Principles**

MIAX Futures has reviewed the Core Principles for designated contract markets (“DCM Core Principles”) and identified that the Advisory may impact the following DCM Core Principles:

- *DCM Core Principle 2 – Compliance with Rules:* The Exchange is responsible to establish, monitor, and enforce compliance with the rules of the Exchange. The Advisory supplements MIAX Futures rules related to position reporting, which supports consistent compliance with and enforcement of such position reporting rules.
- *DCM Core Principle 4 – Prevention of Market Disruption:* The Exchange is required to prevent manipulation, price distortion, and delivery or cash settlement disruptions through market surveillance and enforcement procedures. The Advisory provides additional guidance to reporting

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<sup>1</sup> The Advisory is being issued in conjunction with proposed amendments to MIAX Futures Rule 2.3.5. (see [https://www.miaxglobal.com/sites/default/files/filing-files/2026\\_02\\_17\\_26\\_3\\_40.5a\\_Submission.pdf](https://www.miaxglobal.com/sites/default/files/filing-files/2026_02_17_26_3_40.5a_Submission.pdf)).

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parties on position reporting requirements, which supports the Exchange's ability to carry out its monitoring and surveillance obligations.

- *DCM Core Principle 5 – Position Limitations and Accountability*: The Exchange is required to adopt position limitations or accountability levels as appropriate and to monitor compliance therewith. The Advisory supports the Exchange's enforcement of position limits, in compliance with this Core Principle.
- *DCM Core Principle 7 – Availability of General Information*: The Advisory has been disseminated on the Company's website and will be available under the MIAX Futures Market Regulation Policies and Resources webpage.

MIAX Futures is unaware of any substantive opposing views expressed with respect to this filing. The Advisory is to be effective when posted on the MIAX Futures website, which will be at least 10 business days following the date of this submission.

If there are any questions regarding this submission, please contact me at (612) 321-7141 or [cstuhlmann@miaxglobal.com](mailto:cstuhlmann@miaxglobal.com). Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'C.M. Stuhlmann', with a stylized flourish at the end.

Carmen M. Stuhlmann  
AVP, Associate Counsel

## EXHIBIT A

# Large Trader Reporting and Ownership & Control Reporting Advisory

**Version 1.0**

**Modified Feb 20, 2026**

# Large Trader Reporting and Ownership & Control Reporting Advisory

Associated with MIAX Futures Definitions, Rule 2.3.5, and corresponding product-level position and trading volume thresholds.

MIAX Futures Exchange, LLC (the “Exchange” or “MIAX Futures”) operates a comprehensive large trader reporting program to monitor trade activity for the purposes of enforcing position limits and position accountability levels in MIAX Futures products. Under this program, the Exchange requires MIAX Futures clearing members, OCC clearing members, and FCMs and Foreign Brokers with omnibus accounts to transmit to the Exchange both a daily large trader report (“LTR”) for reportable accounts and certain ownership and control reports (“OCR” files). To facilitate compliance, the Exchange requirements are intended to mirror those of the CFTC’s [LTR program](#) and its [OCR Final Rule](#).

## Who is required to submit LTR and OCR files to the Exchange?

The following firms (the “reporting entities”) are subject to Exchange LTR and OCR reporting requirements:

1. MIAX Futures clearing members;
2. Non-clearing FCMs including all omnibus accounts;
3. OCC clearing members that clear MIAX Futures products; and
4. Foreign brokers subject to CFTC Part 17 reporting.<sup>1</sup>

## At what end-of-day position level does an account become reportable?

For wheat products, including Minneapolis Hard Red Spring Wheat, reportable position levels are:

- Futures: 150 futures contracts, long or short, in any one futures delivery month.
- Options: 150 or more put or call options, long or short, in any one option expiration month.<sup>2</sup>

For broad-based security index products, including B500, Tini B500, and Tini B100 Futures:

- 200 futures contracts, long or short, in any one settlement month.

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<sup>1</sup> <https://www.ecfr.gov/current/title-17/chapter-I/part-17>. Note that some CFTC requirements may be subject to no-action relief.

<sup>2</sup> See Rule 51.14, as proposed to be amended, subject to CFTC approval, available at [https://www.miaxglobal.com/sites/default/files/filing-files/2026\\_02\\_17\\_26\\_3\\_40.5a\\_Submission.pdf](https://www.miaxglobal.com/sites/default/files/filing-files/2026_02_17_26_3_40.5a_Submission.pdf).

Additionally, accounts that are designated “special accounts” under CFTC Part 17 regulations, as may be determined by the reporting entity during the onboarding process, are subject to LTR and OCR reporting. Special accounts are used in LTR reporting to aggregate the activity or end of day open positions of an account controller or beneficial owner when they have multiple trading accounts at a reporting entity. OCR reporting can also trigger the special account designation via the CFTC Form 102A.

### After an account becomes reportable, what must be reported?

**Accounts with positions at or above the reportable level in a particular settlement month of a futures contract, or in all puts or calls of a particular option expiration month, must report all positions for that product, including any position in related products that aggregate together.**

For Aggregation purposes, B500 futures (BX) and Tini B500 futures (TBX) aggregate together. Minneapolis Hard Red Spring Wheat futures and options aggregate together.

**Example 1:** An account has a reportable position of 200 contracts in Tini B500 futures; it must then report all positions in B500 futures in addition to all Tini B500 positions.

**Example 2.** An account has 150 Minneapolis Hard Red Spring Wheat futures in a single delivery month, triggering an obligation to report all other positions in other delivery months and in all Minneapolis Hard Red Spring Wheat options, even if those positions may be below reportable thresholds.

### At what volume threshold does an account become reportable?

Regardless of end-of-day position, any account that meets the volume threshold of contracts traded in a single trading day as defined in CFTC Regulation 15.04 becomes reportable. In other words, when an account’s volume threshold triggers CFTC reporting obligations, the obligation to submit to the Exchange an OCR file for that account is also triggered. Volume threshold reporting is currently subject to CFTC No-Action Relief under [No-Action Letter 24-14](#), raising the reportable threshold to 250 contracts traded in a single day in a single product regardless of expiration or delivery month. To the extent the CFTC no-action position is in effect, the Exchange also recognizes the 250-contract volume threshold for accounts becoming reportable to the Exchange under its rules.

### What forms are used to report LTR and OCR information to the Exchange?

<p><b>Daily Large Trader Position Report (LTR)</b></p>	<p>Any trading account with end-of-day positions at or exceeding certain thresholds, defined in the Exchange Rulebook, must be reported in the LTR. More specifically, if an account has reportable positions in a particular futures or options expiry, all positions, regardless of size, in any contract month and in any contract that aggregates with that contract must be reported.</p> <p>Additionally, the Large Trader Position Report must also identify EFRP volume bought and sold in the reportable contract, by contract month and must also include the number of delivery notices issued and the number of deliveries stopped in the reportable contract. The Exchange may at times require additional information to be included.</p>
<p><b>CFTC Form 102A (OCR)</b></p>	<p>Form 102A requires reporting entities to identify certain ownership and control information associated with “Special Accounts,” i.e. accounts that become reportable by reaching or exceeding the reportable position level threshold. This form must be submitted to MIAX Futures for any account with a reportable position in an Exchange product when an account becomes reportable for the first time and any time a material change occurs that causes the information previously submitted to be inaccurate.</p>
<p><b>CFTC Form 102B (OCR)</b></p>	<p>Form 102B requires reporting entities to identify certain ownership and control information associated with accounts that become reportable by the volume trading threshold. This form must be submitted to MIAX Futures for any account with a reportable trading volume level in an Exchange product when an account becomes reportable for the first time and any time a material change occurs that causes the information previously submitted to be inaccurate.</p>
<p><b>CFTC Form 40</b></p>	<p>MIAX Futures reserves the right to request Form 40 via special call to collect information on reporting traders that are identified on other reporting forms.</p>
<p><b>CFTC Form 71</b></p>	<p>MIAX Futures reserves the right to request Form 71 via special call to collect information on volume threshold accounts that are omnibus accounts, for purposes of identifying the ultimate owner and controller of trade activity.</p>

For more information about CFTC forms, please see the CFTC’s OCR Final Rule in the Federal Register, available at <https://www.federalregister.gov/documents/2013/11/18/2013-26789/ownership-and-control-reports-forms-102102s-4040s-and-71>.

## What are the deadlines for submitting LTR and OCR files to the Exchange?

Exchange deadlines for LTR/OCR submission mirror the CFTC’s LTR/OCR deadlines under Part 17 regulations, including any applicable No-Action Relief.

When an account first becomes reportable, either under the position threshold (requiring Form 102A) or under the volume reporting threshold (requiring Form 102B), the Reporting Entity must file the appropriate form with the Exchange by 9:00 a.m. Eastern Time on the third business day after the first date the account becomes reportable. These same deadlines apply to the requirement to send updated OCR files in the event of a material change. Preliminary OCR information, including Special Account Origination, Account Name, and House/Customer indicator may be required within one business day.

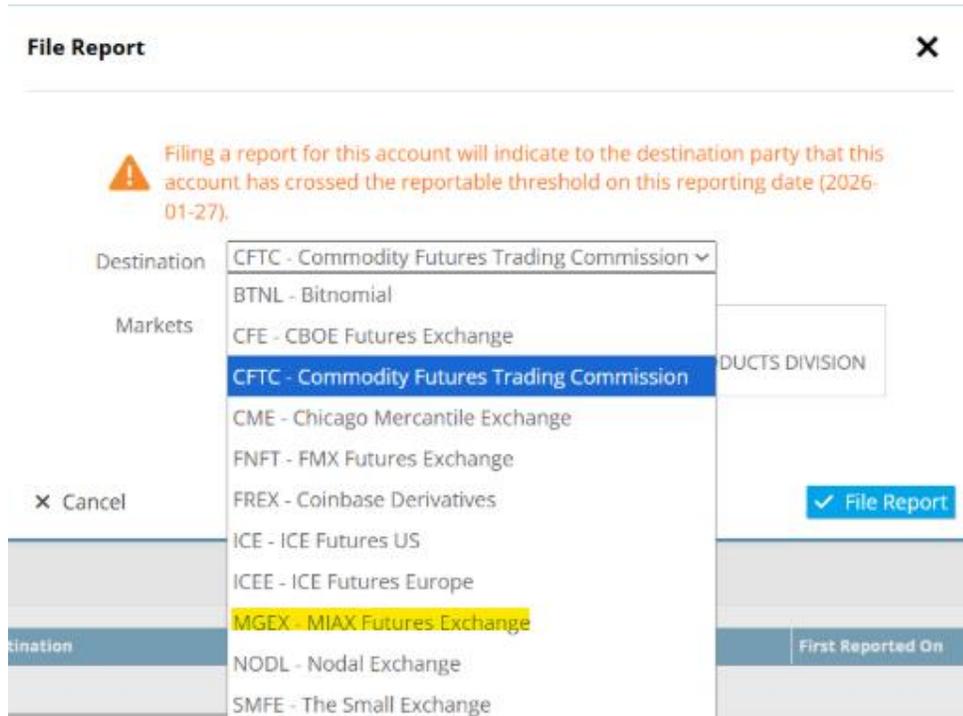
The Exchange may periodically request an updated OCR file for a reportable account (an “OCR refresh”). OCR refreshes are due by 9:00 a.m. Eastern Time on the third business day after the Exchange requests the OCR refresh.

Daily LTR files for large trader position reporting are due by 9:00 a.m. Eastern Time on the business day following that to which the position data pertains, consistent with CFTC Part 17 reporting requirements.

## How should firms submit LTR and OCR files to the Exchange?

All required forms are to be submitted directly to the Exchange via SFTP or through the [OCR solution](#) provided by [FIA Tech](#).

1. For SFTP, please request a MIAX Futures application for SFTP credentials from [MIAXFuturesMarketReg@miaxglobal.com](mailto:MIAXFuturesMarketReg@miaxglobal.com).
  - a. LTR files and OCR files should be sent to the **/input/reg** directory.
2. If using FIA Tech, please set the destination for OCR files to “MGEX – MIAX Futures Exchange” as illustrated below:



3. If needed to set market associations or for a proprietary reporting system, the Market Identifier Codes (“MICs”) for MIAX Futures Exchange are:
  - a. XMGE for commodity products cleared by MIAX Futures; and
  - b. XMFE for financial products cleared by OCC.

### In what format should LTR and OCR files be sent to the Exchange?

The Exchange has adopted CFTC file and data formatting specifications for all LTR and OCR files. Full technical guidance on LTR and OCR data formatting is available on the CFTC website.<sup>3</sup> Nonconforming files will be rejected. In particular, please note the file name guidelines below:

1. **LTR File Name Format:** Per CFTC specifications, the file name for the LTR file must be in the following format: LTR\_[3-letter CFTC-assigned firm ID]\_[YYYYMMDD].txt
  - a. It is acceptable to report LTR position data for multiple reporting entities in one file.
  - b. It is acceptable to overreport positions in the LTR file, e.g., to include accounts holding positions below the reportable threshold.
  - c. The date in the file name must match the **trade date** for the position data.

<sup>3</sup> <https://www.cftc.gov/IndustryOversight/MarketSurveillance/LargeTraderReportingProgram/index.htm> and <https://www.cftc.gov/Forms/OCR/index.htm>. Note that some CFTC requirements may be subject to no-action relief.

- d. Do not truncate the account number in the daily LTR file. The account number in the LTR file should match the account number in the corresponding OCR record. The Exchange will reach out to firms to troubleshoot data validation issues.
2. **OCR File Name Format:** Per CFTC specifications, the file name for the OCR record must be in the following format: OCRFORM\_[FORMNUMBER]\_[3-letter CFTC-assigned firm ID]\_[YYYYMMDD]\_[SOURCE IDENTIFIER]\_[OPTIONAL TRACKING DATA].formxml
  - a. The YYYYMMDD in the name should be the **date of file transmission**.
  - b. Example: OCRFORM\_102\_ABC\_20260130\_OPTIONAL\_OPTIONAL.formxml

### What information needs to be included in the LTR file?

Please see CFTC guidelines on the large trader record format, available at <https://www.cftc.gov/IndustryOversight/MarketSurveillance/LargeTraderReportingProgram/ltrformat.html>.

### What exchange code should be used in the LTR file sent to MIAX Futures?

For LTR purposes, MIAX Futures has two different exchange codes depending on the type of product. For Commodity Products clearing MIAX Futures, the exchange code is "09" and for Financial Products clearing OCC, the exchange code is "XM". Exchange code and strike price format guidelines are available at <https://www.cftc.gov/strikeprice>.

Position data for both exchange codes can be included in the same LTR file.

### What product codes in the LTR file does MIAX Futures recognize?

#### Commodity Products:

- For Minneapolis Hard Red Spring Wheat, use product code MW.

#### Financial Products:

1. For Bloomberg 500 Index Futures, use product code BX.
2. For Tini Bloomberg 500 Index Futures, use product code TBX.
3. For Tini Bloomberg 100 Index Futures, use product code TBQ.

### Where can I get more information or ask questions about MIAX Futures' LTR/OCR reporting requirements?

Questions regarding LTR and OCR requirements may be directed to the Market Regulation Department at [MIAXFuturesMarketReg@miaxglobal.com](mailto:MIAXFuturesMarketReg@miaxglobal.com).

### **Compliance Advisory:**

The Exchange conducts ongoing reviews of Reporting Entities and trading activity on Onyx to identify firms subject to LTR and OCR reporting requirements and verify compliance. Upon request from the Exchange, Reporting Entities must provide requested information in a format and manner prescribed by the Exchange. **Failure to produce the requested information may result in disciplinary action.**

The information contained in this document is for general purposes only and is not tailored to any specific situations of a recipient of this document. The information contained herein is subject to and is superseded by official MIAX Futures Rules, which can be found at [www.miaxglobal.com/markets/futures/miax-futures/rulebook](http://www.miaxglobal.com/markets/futures/miax-futures/rulebook).

## Appendix A (Rule 2.3.5)

### 2.3.5. SUBMISSION OF LARGE TRADER POSITIONS AND VOLUME THRESHOLD ACCOUNTS.<sup>4</sup>

- A. **Large Trader Reporting.** Clearing Members, OCC Members, omnibus accounts, and foreign brokers shall electronically submit to the Exchange a daily large trader position report of all positions required to be reported as set forth in **Rules 3.1.6.**, and **3.1.8**, and as set forth in any product Rules.

Positions at or above the reportable level in a particular expiration month of a futures contract, or in all puts or in all calls of a particular option contract expiration month, are required to be reported. For an account with reportable positions in a particular contract, all positions, regardless of size, in any contract month and in any contract that aggregates with that contract must be reported. The daily large trader position report submitted to the Exchange must also include, for each reportable account, the EFRP volume bought and sold in the reportable instrument, by contract month, and the delivery notices issued and the number of deliveries stopped in the reportable instrument. The Exchange may require additional information be included in the daily large trader position report, including but not limited to office transfers, option exercises, and futures assigned from option exercises.

The Exchange may require that more than one large trader position report be electronically submitted daily. The Exchange may require reports or additional account identification from any Clearing Member, OCC Clearing Member, omnibus account, or foreign broker on a lesser number of positions than reflected in any product rules for each applicable contract.

- B. **Special Account Reporting.** Clearing Members, OCC Clearing Members, omnibus accounts, and foreign brokers which hold, control, or carry a “special account,” as such term is defined by CFTC Regulation 17 CFR Part 15, as amended, must submit to the Exchange information identifying the ownership and control of each special account and all trading accounts related to each such special account and any additional required information after the account reaches or exceeds the applicable reportable position level prescribed by the Commission using CFTC Form 102A (“Identification of Special Accounts”) within three Business Days of the first day that the account in question becomes a reportable account. Notwithstanding the foregoing, if the reportable position level prescribed by the Exchange is lower than the corresponding CFTC reportable level for a contract, such Form 102A must be filed with the Exchange when the position in a special account reaches or exceeds the Exchange prescribed reporting level.
- C. **Volume Threshold Reporting.** A volume threshold account is any account that meets the volume threshold of contracts traded in a single Trading Day as defined in CFTC Regulation 15.04, inclusive of any applicable CFTC no-action relief in effect. Clearing Members, OCC Clearing Members, omnibus accounts, and foreign brokers which hold, control, or carry a

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<sup>4</sup> As proposed to be amended, subject to CFTC approval. See

[https://www.miaxglobal.com/sites/default/files/filing-files/2026\\_02\\_17\\_26\\_3\\_40.5a\\_Submission.pdf](https://www.miaxglobal.com/sites/default/files/filing-files/2026_02_17_26_3_40.5a_Submission.pdf).

reportable volume threshold account must submit to the Exchange information identifying the ownership and control of the volume threshold account and any additional required information using CFTC Form 102B (“Identification of Volume Threshold Accounts”) within three Business Days of the first day that the account in question becomes a volume threshold account. Notwithstanding the three Business Day submission requirement, on the first day that an account becomes reportable, Clearing Members, OCC Clearing Members, omnibus accounts, and foreign brokers must, at the direction of the Exchange, provide the following information: account type, reportable account number, and names and addresses of the owners and controllers of the account.

- D. **Continuing Obligations for Inaccurate Reporting.** The submissions set forth in this Rule shall be made in accordance with the timing and other requirements specified by the Exchange. Should any of the information contained in such submissions become inaccurate, the reporting Clearing Member, OCC Clearing Member, omnibus account, or foreign broker must submit updated, accurate forms and information within three Business Days of such changes becoming effective. Additionally, in the absence of any material changes, the Exchange may require the submission of a new form on an annual basis for the maintenance of accurate records. A material change includes, but is not limited to, change of account name, address, controllers or controlled accounts.
- E. **Form 40/Form 71.** Upon request from the Exchange, Clearing Members, OCC Clearing Members, omnibus accounts, and foreign brokers must provide CFTC Form 40 and/or Form 71.
- F. **Obligations of Omnibus Accounts and Foreign Brokers.** Failure by an omnibus account or foreign broker to submit required information may result in a hearing by the Disciplinary Committee and result in limitations, conditions or denial of access of such omnibus account or foreign broker to the Electronic Trading System. Notwithstanding the obligations on omnibus accounts and foreign brokers set forth in this Rule, Clearing Members/OCC Clearing Members carrying such accounts remain responsible for obtaining and providing to the Exchange information regarding the ownership and control of positions in circumstances where an omnibus account or foreign broker has failed to provide the information to the Exchange.

### Revision History

Revision History				
	Date	Name	Version	Description
1.	February 20, 2026	MIAX Futures	1.0	Initial version
2.				
3.				

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