

## **Subject: Calculation of Professional Orders**

As of Monday, October 3, 2016, pending filing with the SEC, the following changes shall apply to the definition of Professional Orders.

When a member calculates the average number of Professional options orders, per day, during a calendar month for its own beneficial account(s), the following shall be taken in to account:

- Each order that meets the definition of Professional Order counts toward the total number of orders, regardless of the options exchange to which the order was routed. All, order types count toward the determination of the daily 390 order threshold.
- An order that converts into multiple subordinate orders to achieve an execution strategy shall be counted as one order per side and series, even if the order is routed away. An order that cancels and replaces the subordinate order and results in multiple sides/series shall be counted as a new order per side and series.
- A cancel and replace order which replaces a prior order shall be counted as a second order, or multiple new orders in the case of "single-strike algorithms" which track the Best Bid and Offer ("BBO") or National Best Bid and Offer ("NBBO").
- For complex orders on ISE, where the order consists of 8 option legs or fewer, the aggregate of all the legs will be counted as a single order. For complex orders that consist of 9 or more options legs, each leg will count as a separate order. Stock orders will not be included in the number of legs counted.

Members must review their Priority Customers' activity at least on a quarterly basis to determine whether orders must be marked as Priority Customer Orders or Professional Orders.

For more information, please refer to ISE rule filing SR-ISE-2016-19.

For any questions, please contact Market Operations by emailing <a href="mailto:helpdesk@ise.com">helpdesk@ise.com</a> or calling 877-473-9989.