



**THE FOUNDATION
FOR SECURE
MARKETS**

Inbound CFTC
Large Trader Reporting

Version 1.7
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Overview

CFTC regulations require Clearing Members, future commission merchants and non-members (collectively called “Reporting Firms”) to report position information to the exchange and to the CFTC on behalf of those accounts carried on their books that meet the reportable level. Please refer to individual exchange websites for the reportable levels.

OCC provides Large Trader Reporting services to futures exchanges that request this service and also supports receipt of Clearing Members, Service Bureaus and Non-Clearing Members Large Trader reporting for CFE futures. Clearing Members may submit their reports directly to OCC or through a service bureau.

Submitters will transmit their Large Trader position files to OCC on a daily basis. Each file that is submitted will be processed and results reported back to the submitter. A confirmation email will be sent to the submitter informing them of the receipt and statistics on valid/rejected content.

OCC performs only basic validations, primarily format, on the data. Reporting firms are responsible for the completeness and accuracy of the data provided.

Large trader reporting must be submitted by the cutoff time of 6:00 a.m. CT on the morning following the trade date that establishes the position. Files may be sent multiple times, but only the most recent file for the day, submitted before the cutoff time, will be considered when creating the final file of positions for exchanges and the CFTC.

On a daily basis, OCC will generate and transmit a file of valid reported positions to the CFTC and Exchanges.

Reporting Firms may report directly to the CFTC, and those firms may request that data submitted to the OCC NOT be forwarded to the CFTC to avoid duplicate reporting. Submitters may request that their data NOT be forwarded to the CFTC. This is done by contacting the appropriate member services representative at OCC.

Inbound CFTC Large Trader Record Layout

OCC supports submission of Large Trader Positions via the CFTC Large Trader Record format¹. The below layout reflects only the submission of CFE exchange positions to OCC. Reporting firms should directly reference the CFTC layout for all other exchange submissions. Refer to CFTC's Large Trader Reporting Program web page ([cftc.gov](http://www.cftc.gov) Home > Industry Oversight > Market Surveillance > Large Trader Reporting Program > Large Trader Record Format).

Each record is 80 characters long and should be spaced where data is not applicable. The report starts with the Header record, followed by Position Detail records, and ends with the Trailer record.

Report File Structure

The following is a sample of the Large Trader record file sent from participating firms to OCC.

```
HDR                05012015
RP123 ABCDE123456720150501E VX 201505 0000000 00071800000000    A
RP456 ABCDE765432120150501E VX 201506 0000000 00008670000000    A
RP789 EDCBA123456720150501E VX 201505 0000000 000000000000337    A
END
```

¹ <http://www.cftc.gov/IndustryOversight/MarketSurveillance/LargeTraderReportingProgram/Itrformat.html>

Position Detail Records

Below is the Position Detail record layout for the Large Trader record file sent from participating firms to OCC. Every position detail record must be 80 characters long.

Position Details Record – Large Trader Reporting					
Beginning Column	Length	Data Type	Name	Description	Example
1	2	AN	Record Type	The only valid value is “RP”.	RP
3	3	AN	Reporting Firm	A number assigned by the CFTC to identify reporting firms.	123
6	2	-	Reserved	Spaces	
8	12	AN	Account Number	A unique identifier assigned by the reporting firm to each special account. The field is zero filled with account number right-justified.	00AD09440936
20	8	AN	Report Date	The format is YYYYMMDD, where YYYY is the four digits of the year, MM is the month, and DD is the day of the month. Must be less than or equal to Header Date.	20150924
28	2	AN	Exchange Code	Two-character field used to identify the exchange on which a position is held. CFTC-assigned exchange identifiers are CFE (E) and SML (SM).	E
30	1	AN	Call or Put	Valid values for this field are “C” for a call option and “P” for a put option. For futures, the field is blank.	C
31	5	AN	Commodity (1)	An exchange-assigned commodity code for the futures or options contract.	DA035
36	8	AN	Expiration Day (1)	The expiration date of an option. The format is YYYYMMDD, where YYYY is the four digits of the year, MM is the month, and DD is the day of the month.	20150924
44	7	S	Strike Price	This is a signed numeric field. The strike prices must be right justified and the field zero-filled on the left. The use of a decimal point as one of the seven characters is optional.	4098.99
51	1	AN	Exercise Style	Style of exercise: American (A), European (E), or blank.	A
52	7	N	Long-Buy-Stopped	Report long positions open at the end of a trading day.	1000432
59	7	N	Short-Sell-Issued	Reports short positions open at the end of a trading day.	1000234
66	5	AN	Commodity (2)	The exchange-assigned commodity code for a futures contract or other instrument that a position is exercised into from a date-specific or flexible option. For an option on a future, this is the future that the option exercises into.	DA053

Position Details Record – Large Trader Reporting

Beginning Column	Length	Data Type	Name	Description	Example
71	8	AN	Expiration Date (2)	For an option on a future, this is the expiration date of the future the option exercises into. The format is YYYYMMDD, where YYYY is the four digits of the year, MM is the month, and DD is the day of the month.	20150924
79	1	-	Reserved	Space	
80	1	AN	Record Type	Record type is used to correct errors or delete records that have previously been submitted. Valid values are "A", "C", "D" or "blank". "A" or "blank" – Use for all new records. "C" – Corrects information for a previously provided record, this field must contain a "C" or "blank" and the record must contain all information on the previously transmitted record. "D" – Deletes information on a previously provided record and all information on the previously transmitted record.	A

Sample Message – Position Detail

```

RP123 ABCDE123456720150501E VX 201505 0000000 000718000000000 A
RP456 ABCDE765432120150501E VX 201506 0000000 000086700000000 A
RP789 EDCBA123456720150501E VX 201505 0000000 000000000000337 A
    
```

Implementation Considerations

Signed Numeric Fields

The right most character of the Strike Price must be encoded as follows:

Symbol	Number	Sign
{	0	1
}	0	-1
A	1	1
B	2	1
C	3	1
D	4	1
E	5	1
F	6	1
G	7	1
H	8	1
I	9	1
J	1	-1
K	2	-1
L	3	-1
M	4	-1
N	5	-1
O	6	-1
P	7	-1
Q	8	-1
R	9	-1

Trailer Record

Below is the Trailer record layout for the Large Trader record file sent from participating firms to OCC.

Trailer Record – Large Trader Reporting					
Beginning Column	Length	Data Type	Name	Description	Example
1	3	AN	End	The only valid value is "END".	END
4	77	AN	Reserved	Spaces	

Sample Message – Trailer

END

Implementation Considerations

A missing trailer record at the end of the submission does not create a fatal error or cause any records on the file to be rejected. However, it will be reported in the text of the confirmation email sent back to the submitting entity as an informational message.

Appendix – Revision History

Version	Date	Author	Version Updates
1.0	10/23/2015	OCC	Initial version.
1.1	12/14/2015	OCC	Updated for changes to header date, page 5.
1.2	7/11/2017	OCC	Removed from the Expiration Day description on page 6: "This field is blank for futures."
1.3	8/28/2018	OCC	Applied branding updates.
1.4	5/31/2019	OCC	Changed title from <i>Inbound CFTC Futures Large Trader Exchange Reporting</i> to <i>Inbound CFTC Large Trader Reporting</i> . Corrected URL in footnote 1.
1.5	8/30/2019	OCC	Added CFTC-assigned exchange identifier codes to Position Details Record table.
1.6	6/25/2020	OCC	Removed NFX from the CFTC-assigned exchange identifier codes in Position Details Record table.
1.7	9/23/2020	OCC	Removed ONE from the CFTC-assigned exchange identifier codes in Position Details Record table.