



**BOX**<sup>SM</sup>  
REGULATION

October 24, 2019

**VIA EMAIL**

Vanessa Countryman, Acting Secretary  
U.S. Securities and Exchange Commission  
100 F St., N.E.,  
Washington, DC 20549

*Re: Pilot Report of Obvious Errors and Catastrophic Errors during Limit or Straddle States – September 2019*

Dear Ms. Countryman:

BOX Exchange LLC (“BOX”) respectfully submits the following pilot report to the SEC and the public that includes a dataset containing the data for each Straddle and Limit State in optionable stocks, found in Appendix A.

BOX has reviewed Straddle or Limit State trade data during September 2019 and has determined that there were three reportable events on the Exchange that occurred while the underlying security was in a Straddle or Limit State.

If you have any questions, please contact me at 617-235-2022 or BGoodhue@boxregulation.com.

Sincerely,

Bruce Goodhue  
Chief Regulatory Officer  
BOX Exchange, LLC

Enclosures

Cc: Ms. Heather Seidel  
Mr. Richard Holley  
Mr. David Hsu

## Appendix A

### Obvious and Catastrophic Errors During Limit and Straddle States

For the month of September 2019, the Exchange collected the following dataset containing the data for each Straddle and Limit State in optionable stocks.

Trade Date	Option Symbol	Start Time	End Time	State Code	Executed Volume	Weighted Quote Spread	Weighted Bid Size	Weighted Ask Size	High Execution Price	Low Execution Price	Trade Price Exceeds 30% of Last OPRA Price	Post L/S State Price Exceeds 30% of Last OPRA Price
9/18/2019	MDR 190920C3.00	10:50:44	10:50:59	Limit	1	0.25	1	4	0.75	0.75	0	0*
9/18/2019	MAT 190927C9.00	14:22:34	14:22:34	Limit	3	0.35	25	3	2.7	2.7	1	N/A
9/23/2019	PCG 191025P7.00	10:51:41	10:51:41	Straddle	2	2.53	2	1	0.21	0.21	0	0*

\*Outside the 5 minute window.