**ENCORE System – Inbound CFTC
Large Trader Reporting**

**Version 1.8
November 2024**

Contents

Overview

Commodity Futures Trading Commission (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 transmit their Large Trader position files to OCC on a daily basis. Each file that is submitted is processed and results reported back to the submitter. A confirmation email is 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 generates and transmits 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 format[1]. 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 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 00000000000337          A
END
```

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[1] http://www.cftc.gov/IndustryOversight/MarketSurveillance/LargeTraderReportingProgram/ltrformat.html

Header Record

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

Beginning Column	Length	Data Type	Name	Description	Example
1	3	AN	Header	The only valid value is "HDR".	HDR
4	23	AN	Reserved	Spaces	
27	8	N	Header Date	The format is MMDDYYYY, where YYYY is the four digits of the year, MM is the month, and DD is the day of the month.	09242015
35	46	AN	Reserved	Spaces	

Header Record – Large Trader Reporting

Sample Message – Header

```
HDR                     05012015
```

Implementation Considerations

The Header record must be correct or the position detail records are rejected. The Header Date should be equal to or greater than the date OCC is currently reporting.

If the Header Date was already reported to the CFTC, all records in that file are rejected.

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 Detail Records – 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. • Strike prices for products that include integers only (no decimals) must be right justified and zero-filled on the left. • Strike prices for products that include decimals use the last two-to-four positions for the decimals. The prices are right justified and zero-filled on the left. CFTC assigns the decimal location product by product.	0000155 represents 155.00 for an integer only product 0001950 represents 19.50 for a decimal product
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

Position Detail Records – Large Trader Reporting

Beginning Column	Length	Data Type	Name	Description	Example
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
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 Messages – Position Detail

Futures
```
RP123  ABCDE123456720150501E  VX    201505  0000000 00071800000000              A
RP456  ABCDE765432120150501E  VX    201506  0000000 00008670000000              A
RP789  EDCBA123456720150501E  VX    201505  0000000 00000000000337              A
```

Options on Futures
```
RPABC        1234520241018E PUX4E 202410  0001900E00000100000000VX   20241120 A
RPABC        2345620241018E CUX4B 202410  0001950E00000000000010VX   20241120 A
RPABC        3456720241018E CIBGO 202412  0000140A00000030000003IBIG 20241202 A
RPABC        4567820241018E PIBGO 202412  0000142A00000000000003IBIG 20241202 A
```

Implementation Considerations

Signed Numeric Fields

The right most character of the Strike Price must be encoded as follows. The right most character of positive strike prices can contain the symbol or the number.

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.

Beginning Column	Length	Data Type	Name	Description	Example
**Trailer Record – Large Trader Reporting**
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	Version Updates
1.0	10/23/2015	Initial version.
1.1	12/14/2015	Updated for changes to header date, page 5.
1.2	7/11/2017	Removed from the Expiration Day description on page 6: "This field is blank for futures."
1.3	8/28/2018	Applied branding updates.
1.4	5/31/2019	Changed title from *Inbound CFTC Futures Large Trader Exchange Reporting* to *Inbound CFTC Large Trader Reporting.* Corrected URL in footnote 1.
1.5	8/30/2019	Added CFTC-assigned exchange identifier codes to Position Detail Records table.
1.6	6/25/2020	Removed NFX from the CFTC-assigned exchange identifier codes in Position Detail Records table.
1.7	9/23/2020	Removed ONE from the CFTC-assigned exchange identifier codes in Position Detail Records table.
1.8	11/1/2024	Clarified the Strike Price format for products that include decimals in the Position Detail Records table.