



Special Executive Report

S-8744

March 24, 2021

Expiration of Certain Regulatory Relief Concerning COVID-19 Pandemic

This Special Executive Report is being issued to remind the marketplace that on March 31, 2021, the temporary no-action relief provided by CFTC Staff Letter [21-04](#) will expire. This no-action relieved participants, subject to certain conditions, of the obligation under CFTC Regulation 1.35 to make and keep records of oral communications. As such, the corresponding temporary relief provided by the Exchanges will also expire on March 31, 2021. **After March 31, 2021, pursuant to Exchange Rule 536, each member and member firm and employees of the foregoing must maintain records of oral communications required to be recorded pursuant to CFTC Regulation 1.35.**

Market participants are also reminded that on April 15, 2021, the temporary no-action relief provided by CFTC Staff Letter [21-05](#) will expire. This no-action relieved participants, subject to certain conditions, of the obligation under CFTC Regulation 1.35 to electronically timestamp order tickets that could not immediately be entered into the exchange trading platform. As such, the corresponding temporary relief provided by the Exchanges will also expire on April 15, 2021. **After April 15, 2021, pursuant to Exchange Rule 536, all customer orders that cannot immediately be entered into the exchange trading platform must be electronically timestamped upon receipt, inclusive of block trade and EFRP orders.**

Information regarding CFTC staff no-action relief is posted on the CFTC's website [here](#).

The terms of the relief granted by the Exchanges are contained in Special Executive Report S-8559RR extended by Special Executive Report S-8707R and may be viewed [here](#).

If you have any questions, please contact one of the following individuals in Market Regulation:

Erin Middleton, 312.341.3286 or Erin.Middleton@cmegroup.com

Robert Sniegowski, 312.341.5991 or Robert.Sniegowski@cmegroup.com

Andrew Vrabel, 312.435.3622 or Andrew.Vrabel@cmegroup.com