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CFTC Staff Issues No-Action Letter, Announces Implementation Updates to 2024 Large Trader Reporting Rule

January 27, 2026

WASHINGTON — The Commodity Futures Trading Commission's Division of Market Oversight today announced it has taken a no-action position regarding the compliance date for the Part 17 large trader reporting final rule in response to a request from the Futures Industry Association.

DMO will not recommend the Commission take enforcement action against futures commission merchants, clearing members, foreign brokers, or designated contract markets for failure to comply with the 2024 Part 17 large trader reporting final rule (<https://www.cftc.gov/PressRoom/PressReleases/8902-24>). The no-action relief will extend for 18 months after CFTC staff execute the actions referenced below.

Today, the CFTC's Division of Data also announced it has published modifications to the Part 17 Guidebook ([https://www.cftc.gov/sites/default/files/2026-01/Part%2017%20Guidebook%20\(v2.0\).pdf](https://www.cftc.gov/sites/default/files/2026-01/Part%2017%20Guidebook%20(v2.0).pdf)). The Guidebook provides detailed instructions to reporting firms regarding the form, manner, coding structure, and electronic data transmission procedures for submitting to the CFTC the data elements in 17 C.F.R. § 17. The modifications provide additional clarity to reporting firms.

DOD also announced the start of Large Trader Reporting Rules implementation testing, and that CFTC staff will begin hosting calls on Feb. 18 with reporting firms regarding the technical implementation.

Reporting firms can find all information regarding these updates, including participation details for the CFTC staff calls, during the implementation period at Part 17 FIXML Implementation (<https://www.cftc.gov/IndustryOversight/MarketSurveillance/LargeTraderReportingProgram/Part17FIXMLImplementation>).

Subject to the conditions of the no-action letter, DMO and DOD expect market participants will be in compliance with the Part 17 large trader reporting final rule by July 26, 2027.

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