



UNLISTED TRADING PRIVILEGES

Nasdaq UTP SIP

SIP Odd Lot Quotes & Best Odd Lot Order (BOLO) Implementation: Frequently Asked Questions (FAQs) Version 1 – March 2026

Support and Contact Information:

For the Odd Lot Hot Cut Release on April 27, 2026, the UTP SIP Administration Team will send a readiness-confirmation email to all UTP SIP Participants (Exchanges and FINRA ADF) and Data Subscribers to ensure all parties are prepared for the release.

If you need to update your contact information for Odd Lot readiness communications, please contact the UTP Administration Team: admin@utpplan.com

For general Odd Lot product questions, please refer to this FAQ. For all other specialized inquiries, please contact the UTP SIP Product Team at products@utpplan.com

General Questions:

1. Why is the UTP SIP making changes?

The Securities and Exchange Commission (SEC) has adopted amendments to certain rules of the National Market Regulation System (Regulation NMS). As part of these amendments, SEC has mandated “Odd Lot” information under the Market Data Infrastructure (MDI) Rules to be included in the exclusive SIPs (Securities Information Processors) so that market participants that subscribe to the exclusive SIP feeds will be able to view and access these orders.

For additional details, please refer to the SEC Final Rule here:

<https://www.sec.gov/files/rules/final/2024/34-101070.pdf>

2. Where can I find a summary of changes?

Participants, Exchanges and data subscribers can find a summary of Odd Lot Implementation changes via the vendor alerts listed below:

<https://www.nasdaqtrader.com/TraderNews.aspx?id=UTP2026-05>

<https://www.nasdaqtrader.com/TraderNews.aspx?id=UTP2026-2>

<https://www.nasdaqtrader.com/TraderNews.aspx?id=UTP2026-03>

3. What is an Odd Lot Quote?

An odd lot quote refers to a quote for a quantity that is less than the standard trading unit (i.e., Round Lot Size) for a symbol.

4. When will this change take effect?

This change will take effect on April 27, 2026.

5. Who is impacted by this change?

All UTP SIP Participants (Exchanges and FINRA ADF) and Data Subscribers are impacted due to the changes to the input and output message formats and must make necessary changes, as applicable.

6. What is the purpose of the SEC exemptive relief for SIP Odd Lot Quotes & Best Odd Lot Order (BOLO)?

The SEC granted temporary exemptive relief to delay the requirement for SIPs to publish depth-of-book Odd Lot quotes until May 2028. This allows SIPs and exchanges to manage several major concurrent market-structure initiatives without added operational risk.

Beginning April 2026, SIPs will still move forward with enhancements by publishing each exchange's best Odd Lot bid and offer along with the consolidated Best Odd Lot Order (BOLO). The delay applies only to deeper Odd Lot quoting requirements, beyond the top-of-book data.

For more information, please visit the SEC exemptive relief here:

<https://www.sec.gov/files/rules/exorders/2026/34-104612.pdf>

<https://www.prnewswire.com/news-releases/sec-grants-request-for-exemption-related-to-dissemination-of-odd-lot-depth-of-book-302668045.html>

7. Will the odd lot quote impact the round lot quotes or NBBO? Can the BOLO lock/cross the NBBO?

Odd Lot Quotes are not protected under Regulation NMS and do not affect round-lot quotes or the NBBO. Because BOLO is calculated separately from the protected NBBO, BOLO may display prices that lock or cross the NBBO. This does not constitute a regulatory lock or cross, as Odd Lot Quotes are non-protected.

8. Are odd quotes mandatory to consume?

Yes. Beginning April 27, 2026, under the SEC's Market Data Infrastructure (MDI) Rules, Odd Lot Quotes—including each exchange's best Odd Lot bid and offer and the consolidated BOLO—become part of the required SIP core data.

9. Are there requirements as to how a Participants should aggregate their orders for reporting odd lot quotes?

Each Participant is required to support the dissemination of odd lot quotes to the SIPs. UTP SIP will publish odd lot quotes on existing quote channels intermingled with the round lot quotes, as such Data Subscribers must make necessary changes to parse the messages. However, as noted, the odd lot quotes are not protected and as such Data Subscribers should determine their obligations if deciding to ignore the odd lot quotes.

10. Will there be an increase in bandwidth requirements?

No, there is no expected increase in bandwidth requirements for the implementation of odd lot -of-book and BOLO functionality. Based on current capacity planning and volume estimates, existing bandwidth allocations are sufficient to support the additional traffic.

For more information, please visit the UTP Website:

<https://www.utpplan.com/metrics>

<https://www.nasdaqtrader.com/TraderNews.aspx?id=UTP2025-17>

11. Will odd lot quotes and BOLO be included in SIP Snapshots?

Yes. Beginning April 27, 2026, Odd Lot Quotes and the consolidated Best Odd Lot Order (BOLO) will be included in the SIP Snapshot Services in alignment with the SEC's Market Data Infrastructure (MDI) requirements.

12. Industry Tests/Confidence Tests/Activations

- **Industry Test #1: Saturday, March 7, 2026** - Functional and Capacity testing
- **Industry Test #2: Saturday, March 21, 2026** - Functional and Intraday Fallback testing
- **Industry Test #3: Saturday, March 28, 2026** - Functional and Failure/Recovery testing
- **Failover/MWCB Tests: Saturday, April 11, 2026** - Failover to DR site and Market-Wide Circuit Breaker testing (using Odd Lots of functionality)
- **Industry Test #4: Saturday, April 18, 2026** - Functional testing
- **Confidence Test: Saturday, April 25, 2026** - Final functional test
- **Activation: Monday, April 27, 2026** - New Functionality goes live

For Odd Lot nightly and weekend testing please connect to UTP IP addresses here:
https://www.utpplan.com/DOC/IP_Addresses_for_UTP_Data_Feed_Services.pdf

For more information on UTP SIP's transmission schedule for weekend testing,
please visit here:

https://www.utpplan.com/DOC/UTP_SIP_Transmission_Schedule.pdf