



**TO: ALL CLEARING MEMBERS**  
**DATE: JULY 1, 2019**  
**SUBJECT: ETN REMOVAL FROM CUSTOMER PORTFOLIO MARGIN  
THEORETICAL OUTPUT FILE**

Effective Friday August 16, 2019 all remaining Exchange Traded Note (“ETN”) products will be removed from the Customer Portfolio Margin (“CPM”) theoretical output file. ETNs are classified as debt instruments and are not included in the listing of instruments eligible for Portfolio Margin as provided for in FINRA Rule 4210(g)<sup>1</sup>.

The CPM theoretical values output file currently includes approximately 40 ETNs (listed below) that were included in the CPM program prior to the clarification that ETNs are not eligible and will be removed.

Please note that ETN and ETN option theoretical values will continue to be included in the RBH theoretical output file.

| Symbol | Name                                      | Class Group |
|--------|---|-------------|
| ADZ    | DEUTSCHE BK AG LDN BRHDB AGRIC SHT ETN    | 230         |
| AGA    | DEUTSCHE BK AG LDN BRHDB AGRIC DBL SHT    | 230         |
| AMJ    | JPMORGAN Alerian MLP ETN                  | AMJ         |
| ATMP   | BARCLAYS BK PLCETN+ SEL MLP               | ATMP        |
| BDD    | DEUTSCHE BK AG LONDON BRHDB BASE MET DBL  | BDD         |
| BOM    | DEUTSCHE BK AG LONDON BRHDB BASE MET DBL  | BOM         |
| BOS    | DEUTSCHE BK AG LONDON BRHDB BASE MET SHRT | BOS         |
| DAG    | DEUTSCHE BK AG LDN BRHDB AGRIC DBL LN     | 230         |

<sup>1</sup> See FINRA Regulatory Notice 19-21

|       |  |       |
|-------|--|-------|
| DGAZ  | CREDIT SUISSE NASSAU BRHVLCTYSHS 3X INV            | 227   |
| DGLD  | CREDIT SUISSE NASSAU BRH3X INVERS GOLD             | UGLD  |
| DGP   | DEUTSCHE BK AG LDN BRHDB GOLD DBL LNG              | 237   |
| DGZ   | DEUTSCHE BK AG LDN BRHDB GOLD SHORT                | 237   |
| DJP   | iPath Bloomberg Commodity Index Total Return ETN   | DJP   |
| DLBL  | BARCLAYS BK PLC30 YR TREAS BULL                    | 345   |
| DLBS  | BARCLAYS BK PLC30 YR TREAS BEAR                    | 345   |
| DRR   | Market Vectors Double Short Euro ETN               | 35    |
| DSLX  | CREDIT SUISSE NASSAU BRH3X INVERS SILV             | 226   |
| DTO   | DEUTSCHE BK AG LONDON BRHDB CRUDE OIL DBL          | DTO   |
| DYY   | DEUTSCHE BK AG LDN BRHDB COM DBLE LNG              | DYY   |
| DZZ   | DEUTSCHE BK AG LDN BRHGOLD DOUBLE SHOR             | 237   |
| GLDI  | CREDIT SUISSE NASSAU BRHX LINK GOLD SHS            | GLDI  |
| GRU   | SWEDISH EXPT CR CORPMLCX GRN ETN23                 | GRU   |
| IMLP  | BARCLAYS BK PLCIPATH S&P MLP                       | IMLP  |
| JJOFF | iPath Bloomberg Coffee Subindex Total Return ETN   | JO    |
| MLPI  | UBS E-TRACS Alerian MLP Infrastructure Index ETN   | AMPLP |
| MLPY  | MORGAN STANLEYCUSHNG MLP ETN                       | MLPY  |
| MORL  | UBS AG LONDON BRHETRACS MTH2XRE                    | MORL  |
| NIB   | iPath Bloomberg Cocoa Subindex Total Return ETN    | NIB   |
| OILNF | Ipath Goldman Sachs Crude ETN                      | OIL   |
| PTM   | E-TRACS UBS Long Platinum ETN                      | PTM   |
| RJA   | Elements- Rogers Intl Comm Indx- Agri Tot Ret ETN  | RJA   |
| RJI   | Elements Rogers Intl Comm Indx Tot Ret ETN         | RJI   |
| RJN   | ELEMENTS-Rogers Intl Comm Indx- Energy Tot Ret ETN | RJN   |
| SFLA  | BARCLAYS BK PLCIPATH S&P 500 IN                    | SFLA  |
| TVIX  | CREDIT SUISSE NASSAU BRHVELOCITY SHS DAI           | VXX   |
| UGAZ  | CREDIT SUISSE AG NASSAU BRHVLCTYSHS 3X S&P         | 227   |
| UGLD  | CREDIT SUISSE NASSAU BRH3X LONG GOLD               | UGLD  |
| URR   | Market Vectors Double Long Euro ETN                | 35    |

|      |   |      |
|------|---|------|
| USLV | CREDIT SUISSE AG NASSAU BRHVELOCITY SHS EXC | 226  |
| VIIX | VelocityShares VIX Short-Term ETN           | VXX  |
| ZIV  | CREDIT SUISSE NASSAU BRHINVRS VIX MDTERM    | VIXM |

For questions regarding this memo, Clearing Members may contact Member Services at 1-800-544-6091 or, within Canada, at 1-800-424-7320, and email [memberservices@theocc.com](mailto:memberservices@theocc.com) or [pricingandmargins@theocc.com](mailto:pricingandmargins@theocc.com).