

#56624

Date: May 29, 2025

Subject: 2025 Business Continuity/Disaster Recovery Industry Test Strategy

Test Overview

Securities Industry and Financial Markets Association (SIFMA) leads, and OCC participates in an annual industry-wide business continuity test to exercise and verify the ability of Options and Futures firms, exchanges and market utilities to operate through an emergency, using backup sites, recovery facilities and backup communication capabilities across the industry. This test is a validation of market connectivity and interactive processing, but is not a full test of internal systems of firms, exchanges, and market utilities.

This industry test allows OCC participants (members and exchanges) to connect to the OCC's DR environment and execute trade and post trade clearing transactions. OCC will be supporting a RegSCI-style test and will not be supporting the classic ping style testing.

Test Day Business Date

OCC will run this year's Industry Test using Saturday, October 25, 2025, as the business date. Any trade or post trade data submitted to OCC should have a business date of 10/25/2025 and any messages with a different business date will be rejected.

Is participation mandatory or optional?

Members mandated for participation in the 2025 test were formally notified in November of 2024. Test participation is required for mandated members. Participation is optional (although highly encouraged) for non-mandated members.

Firms unsure of their mandate status should contact their OCC Clearing Member Representative.

Is Connectivity pre-testing required? If so, what is the connectivity pre-test date?

Yes, connectivity testing is required for the connections that will be leveraged during the actual BC/DR test date. Failure to participate in connectivity pre-testing may result in adverse impacts to a firm's BC/DR test effort.

Connectivity pre-testing date is provided below.

Saturday, September 27, 2025 When will the test take place? Industry-wide BC/DR Test, Saturday October 25, 2025 Is Registration Required? Yes, registration is required for all participants. Participants mandated by OCC are automatically registered by OCC and no further action is required. All non-mandated participants are required to register directly with OCC. Participants can register by accessing the following link and submitting a test request. OCC will not be accepting any registrations through SIFMA or FIA. OCC BC/DR Registration Link Is there a cut-off date for registration? Yes, July 31, 2025 will be the last day available to register for participation in the RegSCI BC/DR industry test with OCC. What OCC applications are involved in the test? The ENCORE application will be available for testing on-line, batch, and real-time processing. Who do I contact for further information? Please contact the following for further information: □ occDRtest@theocc.com – Primary Group Distribution ☐ Your OCC Clearing Member Representative **Test Scope** What does the test entail for OCC Members & Exchanges? Exchanges will: Transmit matched trades to OCC for processing throughout the mock trading cycle ☐ Balance trades with OCC once the market has closed Receive and verify outbound DDS through connections to OCC's DR environment Firms will: □ Submit post trade transactions to OCC utilizing the communication protocols normally used in production (External ENCORE, Real-time, Batch SFTP) Receive and verify outbound DDS through connections to OCC's DR Environments

Test Format and Script

☐ Access On-demand and Core reports through External ENCORE

What are the expectations for Exchanges? Submit matched trades to OCC throughout the mock trading cycle □ Submit balance sets and balance trades with OCC Submit batch trade backup file ☐ Receive Real-time DDS (pended/rejected trades) if applicable ☐ Receive Options Regulatory Surveillance Authority file (ORSA) Exchange will purge all test data from systems prior to Monday market open What are the expectations for the participating firms? Submit a representative sampling of post trade transactions that are normally executed daily (i.e. transfers, adjustments, exercise, etc.) utilizing the firm's communication protocols – MQ, SFTP, Online via External ENCORE □ Post trade transactions should cover the following: Approved product types for the firm (equity, index, etc.) Weekly, near-term, and long-term expirations Receive and verify outbound DDS utilizing the firm's communication protocols ☐ Firms will purge all test data from systems prior to Monday market open Is there a test script or test symbols? ☐ There are *no test scripts* for participation with OCC other than the expectations identified above. OCC will work with each testing party to develop an agreed upon testing strategy that meets the needs of the test and covers the testing parties' expectations. Participants will be required to signoff on the documented testing strategy prior to participation in the test. □ OCC will support production products and series for the test What is the testing window on the test day?

The testing window will run from 8:15 a.m. ET to 4:00 p.m. ET per the following schedule.

Business Date	Time (ET)	Activity	Inputs/ Outputs	Description
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Saturday 10/25/25	8:15 a.m. – 8:45 a. m.	Pre-Market Open Connectivity – Exchange Only	N/A	Resolution of connectivity & start-up issues
	8:45 a.m. – 9:15 a.m.	Pre-Market Open Connectivity – Participants	N/A	Resolution of connectivity & start-up issues
	9:30 a.m. – 1:00 p.m.	Mock Trading Cycle + Post Trade Cycle	Inputs	- Real-time Trades (Exchanges) - Trade Balancing (Exchanges) - Backup Batch Trade Files (Exchanges) - Real-time FIXML Post Trades (Members) - Batch FIXML Post Trades (Members) - External Encore Post Trades (Members) - Real-time Trade DDS – Pends/Rejects (Exchanges) - Real-time DDS (Members)
	1:00 p.m.	Market Close – Exchange Checkpoint		
	1:00 p.m. – 4:00 p.m.	Positions Finalization / End of Day	Inputs Outputs	- N/A - ORSA DDS (Exchanges) - Batch DDS (Members) - External Encore Reports (Members)
				□ Position Activity □ Position Summary

If you have any questions, please contact your Clearing Member representative or the Member Services Help Desk at the following numbers: 800-621-6072 or 800-544-6091. Within Canada, please call 800-424-7320. Clearing Members may also e-mail us at memberservices@theocc.com.