2011 SECURITIES INDUSTRY BUSINESS CONTINUITY TEST

October 29, 2011

SUMMARY OF RESULTS

Test Lead By

Securities Industry and Financial Markets Association



2011 SECURITIES INDUSTRY BCP TEST October 29, 2011 **Summary of Results**

Executive Summary

The 2011 test is part of an ongoing industry-driven backup site testing initiative that began in 2003 and is led by Securities Industry and Financial Markets Association (SIFMA)¹.

The 2011 test followed the format of prior industry-wide tests where firms submit test orders and transactions from their backup sites to the markets and industry utilities. The test involved components for Equities, Options, Fixed Income, Clearing and Settlement Utilities, Market Data, Payment Systems, Treasuries and FX. The exercise was supported by all major exchanges, markets and industry utilities. Participation in the test was voluntary and results for specific firms, exchanges, markets and utilities are retained in strict confidence by SIFMA.

Participants in the SIFMA test included over 220 securities firms and 60 market organizations. During the test approximately 1570 communications connections were establish between securities firms and banks and the exchanges, markets and utilities. Test transactions on these connections were successful 95% of the time. These results were generally comparable to prior tests. These results underscore the ability of the securities industry to operate through adverse conditions

In parallel with the SIFMA test on October 29, the Futures Industry Association led a backup site test of the futures exchanges and clients. The Futures test included 16 futures exchanges and clearing organizations. In the futures test, 62 clearing/nonclearing firms and 47 trading firms participated. 93% of these firms tested successfully.

confidence in the financial markets. SIFMA, with offices in New York and Washington, D.C., is the U.S. regional member of the Global Financial Markets Association ("GFMA"). For more information, visit www.sifma.org.

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The Securities Industry and Financial Markets Association ("SIFMA") brings together the shared interests of hundreds of securities firms, banks and asset managers. SIFMA's mission is to support a strong financial industry, investor opportunity, capital formation, job creation and economic growth, while building trust and

Test Objectives

- To assess the ability of securities market participants to operate through a significant emergency from their backup data centers and work area recovery sites and to examine the level of resiliency of the markets and the industry overall.
- 2. To provide firms and exchanges with an opportunity to test and evaluate their backup sites and backup communications with the markets on a single day.

Markets and Utilities Tested and Expanded Test Components

The 2011 test included components for Equities, Options, Fixed Income, Clearing and Settlement Utilities, Market Data, Payment Systems, Treasuries and FX.

Market participants included all major exchanges, markets and industry utilities plus major service bureaus and market data vendors. See **Appendix A** for list of participating market entities.

For 2011, the test was enhanced in a number of ways with new test components and additional participating markets.

- ✓ New exchanges and markets were added including BATS Equities (BZX, BYX), BATS Options, Direct Edge Equities (EDGA, EDGX) and Tullet Prebon (FI IDB)
- ✓ A new test component was added for foreign exchange (FX) that included Bloomberg TRADEBOOK, Bloomberg FXGO, Hotspot and Thomson Reuters.
- ✓ The 2010 Treasury Auction pilot test was expanded this year to include additional dealers.
- ✓ A new test was included with the New York Fed that involved a mock securities lending operation in Fed Trade v3.6 (production environment).
- ✓ Buy side firms were encouraged to participate in the test this year. A number of additional firms registered that conduct business directly with the exchanges, markets and utilities. We began experimenting with a test between buy side firms and broker/dealers. This concept will be expanded in 2012.

The Financial Information Forum assisted in coordinating with the services bureaus and market data vendors during the test.

Test Format

Participating firms, exchanges, industry utilities, service bureaus and payment banks, operating from backup sites (data center and work area recovery), simultaneously submitted scripted test transactions to markets and settlement entities and receive simulated confirmations. The test was not intended to be a simulation of any specific real event.

Firms and markets were requested to test from backup locations but, in some instances, this was not technically feasible. For a connection between a firm and a market to be considered a valid test interaction, at least one of the entities had to test from a backup site. A number of exchanges and markets and some firms run multiple "hot" sites as a normal data center configuration. In a multiple hot site configuration, order traffic is routed automatically to one or more of the sites and if a site fails, traffic is automatically shifted to the operational sites. This test did not require shutdown of one of the hot sites.

Test Participants Summary

Exchanges, Markets and Industry Utilities	41
(Equities, Options, FI, Clearing, Treasuries, FX)	
Securities Firms	220
(Including those testing directly with markets	
and through service bureaus)	
Service Bureaus	11
Market Data Vendors	8
Payment Organizations	3
Future Exchanges and Clearing Organizations	16

See Appendix A for a complete list of market entities participating. The names of the participating firms will not be released.

Overall Test Results

There were 1570 test interactions in the SIFMA test components of which 95% were successful.

The success rate for 2011 is in line with results for the past few years.

The firms participating in the test account for greater than 85 percent of the normal market volume.

Notes: A test interaction is a connection between a firm and an exchange, market, service bureau or utility. Test interactions are considered successful if a two-way communication is recorded during the test window. Interactions that experienced issues that were corrected during the test window were counted as successful tests.

Successful Test Interactions by Market

Equities	94%
Options	93%
Fixed Income	93%
Clearing & Settlement	100%
Treasury	100%
FX	100%
Market Data	96%
Service Bureaus	96%
Total	95%

Types of Issues Resulting in Unsuccessful Test Interactions

The type of issues noted during this year's test are consistent with issues encountered in prior test except that the organizations experiencing the problems seem to vary from year to year. Types of problems include:

- ✓ General connectivity issues at firms
- ✓ System specific connectivity issues at firms
- ✓ System specific connectivity issues at one clearing bank

Observations and Conclusions

- This test and prior annual industry tests have consistently achieved extremely
 positive results that underscore the ability of the industry as a whole to operate
 through adverse conditions.
- One of the primary values of the annual test is the opportunity it provides for firms and markets to test their backup strategies collectively as an industry.
- The types of problems that caused the failures during this test were not so significant that, during a real event, they could not be addressed fairly quickly with full resources.
- Participants agree that it is valuable to continue to modify and expand the scope of the test each year.
- The backup strategies installed by securities firms and market entities performed extremely well.
- The need for firms to regularly and frequently test their backup connections to market entities is critical.
- Firms should ensure that appropriate controls are in place to manage changes
 to applications and hardware that may impact backup site connectivity to
 markets. Some of the problems seen during the test resulted from
 applications changes and hardware configuration changes that were installed
 since the last test.

Inquires About the SIFMA Test

Inquires about the test may be directed to:

Karl Schimmeck Vice President SIFMA 120 Broadway, 35th floor, New York, NY 10271 212-313-1183 kschimmeck@sifma.org

Futures Industry Test

For information about the Futures test led by Futures Industry Association, see http://www.futuresindustry.org/business-continuitydisaster-recovery.asp

Appendix A

PARTICIPATING MARKET ORGANIZATIONS

BATS BZX BATS BYZ NASDAQ ACT Chicago Stock Exchange Omgeo Direct Edge EDGA SWIFT FX Bloomberg Tradebook NASDAQ NASDAQ Payments NASDAQ OMX PSX Fedwire NASDAQ OMC BX National Stock Exchange SWIFT Fix Bloomberg Tradebook Hotspot Hotspot Thomson Reuters RTFX SWIFT SWIFT Futures	Equities	Clearing/Settlement	<u>Treasuries</u>
Chicago Stock Exchange Direct Edge EDGA SWIFT FX Bloomberg Tradebook NASDAQ Payments NASDAQ OMX PSX Fedwire NASDAQ OMC BX National Stock Exchange Omgeo SWIFT FX Bloomberg Tradebook Hotspot Hotspot Thomson Reuters RTFX SWIFT	BATS BZX	DTCC	US Treasury Auctions
Direct Edge EDGX Direct Edge EDGX NASDAQ Payments NASDAQ OMX PSX Fedwire NASDAQ OMC BX National Stock Exchange SWIFT EX Bloomberg Tradebook Bloomberg FXGO Hotspot Thomson Reuters RTFX SWIFT	BATS BYZ	NASDAQ ACT	Govex
Direct Edge EDGX NASDAQ Payments Bloomberg Tradebook Bloomberg FXGO Hotspot NASDAQ OMX PSX Fedwire NASDAQ OMC BX CHIPS Thomson Reuters RTFX National Stock Exchange	Chicago Stock Exchange	Omgeo	
NASDAQPaymentsBloomberg FXGONASDAQ OMX PSXFedwireHotspotNASDAQ OMC BXCHIPSThomson Reuters RTFXNational Stock ExchangeSWIFT	Direct Edge EDGA	SWIFT	<u>FX</u>
NASDAQ OMX PSX Fedwire Hotspot NASDAQ OMC BX CHIPS Thomson Reuters RTFX National Stock Exchange SWIFT	Direct Edge EDGX		Bloomberg Tradebook
NASDAQ OMC BX CHIPS Thomson Reuters RTFX National Stock Exchange SWIFT	NASDAQ	<u>Payments</u>	Bloomberg FXGO
National Stock Exchange SWIFT	NASDAQ OMX PSX	Fedwire	Hotspot
	NASDAQ OMC BX	CHIPS	Thomson Reuters RTFX
NYSE/Euronext <u>Futures</u>	National Stock Exchange	SWIFT	
	NYSE/Euronext		<u>Futures</u>
NYSE/AMEX <u>Market Data</u> Canadian Derivatives Clearing	NYSE/AMEX	Market Data	
Bloomberg		Bloomberg	•
Options eSignal CBOE Futures Exchange	<u>Options</u>	eSignal	-
BATS Options Factset CME Group	BATS Options	Factset	•
Boston Options Exchange Fidessa ELX Futures	Boston Options Exchange	Fidessa	
Chicago Board Options FT Interactive Data ICE Clear Canada		FT Interactive Data	
Exchange OCT Markets Group ICE Clear EU		OCT Markets Group	
NASDAQ OMX PHLX SIX Telekurs ICE Clear US		SIX Telekurs	
NASDAQ NOM Thomson Reuters ICE Exchanges		Thomson Reuters	•
NYSE/ARCA International Derivatives Clearing Group			
The Options Clearing Corporation Service Bureaus Kansas City Board of Trade		Service Bureaus	Kansas City Board of Trade
Broadridge ICI Mercado Español de Futuros		Broadridge ICI	
Fixed Income Broadridge BPS Financieros	Fixed Income	Broadridge BPS	Financieros
BondDesk - ATS Broadridge SIS Minneapolis Grain Exchange	BondDesk - ATS	•	,
MarketAxess - ATS CRI Montreal Exchange	MarketAxess - ATS	CRI	-
The Municenter - ATS Fidessa New York Portfolio Clearing	The Municenter - ATS	Fidessa	New York Portfolio Clearing
TradeWeb - ATS Lava Trading NYSE Liffe US	TradeWeb - ATS	ŭ	
Dealerweb - IDB OTC Markets Group SB Options Clearing Corporation	Dealerweb - IDB	OTC Markets Group SB	Options Clearing Corporation
eSpeed - IDB ReadQ	eSpeed - IDB	ReadQ	
ICAP - IDB SunGard Phase 3	ICAP - IDB		
Tullett Prebon – IDB SunGard Brass	Tullett Prebon – IDB		
Bank of New York - Clrg Bank Thomson Reuters BETA Systems	Bank of New York - Clrg Bank		
JP Morgan Chase - Clrg Bank	JP Morgan Chase - Clrg Bank	0,0001110	