

FINANCIAL INFORMATION FORUM

February 4, 2026

By electronic mail

Securities and Exchange Commission

100 F Street, NE

Washington, DC 20549

Attn: Andrea Orr, Deputy Director, Division of Trading and Markets

John F. Prochilo III, Advisor to the Director, Division of Trading and Markets

Financial Industry Regulatory Authority, Inc.

1735 K Street, NW

Washington, DC 20006

Attn: Robert McNamee, Vice President & Associate General Counsel

Re: Dissemination of Fractional Shares by the Securities Information Processors and the Vendor Display Rule

Dear Mr. McNamee, Ms. Orr and Mr. Prochilo,

Financial Information Forum (“FIF”) is submitting this letter to the Securities and Exchange Commission (the “Commission”) and the Financial Industry Regulatory Authority (“FINRA”) to highlight an issue that FIF members have raised to FIF in connection with the upcoming changes for the Securities Information Processors (the “SIPs”) to disseminate fractional share quantities.¹ This letter specifically relates to compliance with Rule 603(c) of the Commission’s Regulation NMS, often referred to as the “vendor display rule”. FIF wants to highlight up-front that FIF is not requesting any delay in the implementation of the planned SIP changes or the associated changes to reporting to the FINRA/Nasdaq and FINRA/NYSE Trade Reporting Facilities (the “TRFs”); these changes will take effect on February 23, 2026.

As FIF members have proceeded to implement the TRF and SIP changes, they have identified as a potential issue that the vendor display rule could be interpreted to require broker-dealers to disseminate last sale quantities to six decimals. FIF members believe that the requirement to display last sale quantities to six decimals should be optional and that broker-dealers should have the option to

¹ See, for example, Nasdaq FIX for Trade Reporting Programming Specification (Dec. 2025), available at [NASDAQ FIX API](#), and NYSE Pillar Gateway FIX Protocol Specification (Aug. 22, 2025), available at [NYSE Pillar FIX Gateway FINRA NYSE TRF FIX Protocol Specification.pdf](#).

round or truncate fractional share amounts in complying with the vendor display rule. Given that only trade executions of a round lot or higher are displayed pursuant to the vendor display rule, the fractional portion of a trade that is displayed would likely not be material to a customer. For example, if a stock has a round lot of 100 shares, and a trade is executed for 100.6 shares, the “.6” shares would represent less than 1% of the executed quantity; similarly, if a stock has a round lot of 40 shares, and a trade is executed for 40.6 shares, the “.6” shares would represent 1.5% of the executed quantity. FIF members would not consider this fractional portion to be material to a customer. FIF members also are concerned about using limited screen space to provide this information. This concern is heightened with the continuing increased use of mobile apps for trading. FIF members also are concerned that broker-dealers will adopt different interpretations as to what is required.

FIF members also are concerned about having to implement the display of fractional share quantities to customers by February 23 if the Commission and FINRA determine that this is required. FIF members understand that vendors are making progress towards providing fractional trade quantities to broker-dealers, but FIF members are concerned about the limited time for testing and implementation. While FIF members have been working for some time on reporting fractional shares to the TRF and processing fractional shares from the SIPs, it is only more recently that a number of FIF members have focused more specifically on the vendor display requirement. If the Commission and FINRA determine that a broker-dealer is required to display fractional shares trades to six decimals to comply with the vendor display rule, FIF requests that the Commission and FINRA provide broker-dealers an additional period of 180 days to implement this change. Consistent with the discussion above, FIF members would greatly prefer that the Commission and FINRA provide guidance (and exemptive relief, if necessary) that a broker-dealer, in complying with the vendor display rule, has the option to display fractional quantities or to round or truncate fractional quantities to the nearest whole-share quantity.

FIF understands that this letter is being submitted on short notice and that the Commission and FINRA are currently focused on a number of regulatory initiatives. FIF members and FIF appreciate the Commission’s and FINRA’s consideration of the request discussed above. Please contact me at howard.meyerson@fif.com if you would like clarification on any of the points discussed in this letter.

Very truly yours,

/s/ Howard Meyerson

Howard Meyerson
Managing Director, Financial Information Forum