

// REGULATORY DEEP-DIVE BRIEFING

ATS-N Filings & Market Structure Developments

Coverage period: April 3 – May 27, 2026

FILINGS REVIEWED 31	CRITICAL FILINGS 4	FINRA NOTICES 11	TRACKING WINDOW 60d
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// EXECUTIVE SUMMARY

What changed in the past 60 days

The registered ATS universe filed 31 amendments in the past 60 days. Most are routine administrative updates under Rule 304(a)(2)(i)(B). Four filings stand out as material for institutional desks watching overnight trading, venue economics, and matching mechanics:

- **FINRA Notice 26-07.** Trade Reporting Facility (TRF) opening hours extended to 4:00 AM ET effective March 30, 2026. This is the regulatory infrastructure that enables overnight ATS price discovery. A limited exception (.W modifier) covers overnight batch processes and ETF NAV-based trades.
- **OneChronos Material Amendment (Feb 17).** OneChronos publicly described its full architecture: periodic call auctions, distributed Points-of-Presence, nanosecond timestamps, multilateral matching, and Expressive Bidding for paired-security execution. Fundamentally different from continuous order-book ATSs.
- **BNP Paribas Cortex (May 14).** Cortex ATS updated counterparty interaction logic. New dynamic recategorization: orders from Categories 4–5 reclassify to Category 3 after 5 milliseconds of resting time. Self-cross prevention is now on by default.
- **Bruce Markets fee schedule (Apr 6).** Bruce disclosed full fee schedule: taking-side execution fee \$0.00–\$0.0020 per share (30 bps for sub-\$1 names). Market data licensing tier ranges from \$5K to \$22K per month.

FINRA Notice 26-07 — The Rule That Lit Up Overnight

PUBLISHED	March 9, 2026
EFFECTIVE	March 30, 2026
RULE	FINRA Rule 6380A / 6380B
SCOPE	All NMS stock trade reporting

FINRA's Trade Reporting Facilities (TRFs) now open at **4:00 AM ET**, replacing the previous 8:00 AM open. This is the structural infrastructure that enables the overnight ATS ecosystem — BlueOcean ATS, Bruce Markets, and Moon ATS all depend on the ability to print trades to the consolidated tape during pre-market hours.

Notice 26-07 adds a carve-out for "qualifying overnight transactions" — last-sale reports for trades that (i) carry the **.W modifier** (special pricing, average weighting, or NAV-based) and (ii) either result from an overnight batch process or involve ETF shares priced on NAV. These can be reported by 8:15 AM ET on trade date rather than within 10 seconds of execution.

Why this triggered the May 8 bank-ATS cluster

Goldman Sachs (SIGMA X), J.P. Morgan (JPB-X), and Instinet all filed unilateral amendments to their Form ATS-N on May 8, 2026 — same day. This was not a separate regulatory deadline. It was three large bank ATSs updating their published procedures to reflect the new TRF operating hours and .W modifier handling, during their normal operational review cycle.

Sapinover-specific implications

- **Pipeline foundation.** This is the rule that makes the 3-venue overnight pipeline operationally clean. The 4 AM TRF open means overnight ATS prints flow to the consolidated tape in close to real time.
- **ETF NAV trades get relaxed reporting.** Any IBIT, ETHA, or SLV trades priced off NAV may carry the .W modifier and report later. This affects how clean our overnight VWAP is for ETF flows.
- **Insights piece candidate.** "The Quiet Rule That Lit Up Overnight: Why FINRA's 4 AM TRF Opening Is the Infrastructure Win of 2026."

OneChronos — Material Amendment (Feb 17, 2026)

VENUE	OneChronos Markets LLC
FILE NUM	013-00156
FORM	ATS-N/MA — Rule 304(a)(2)(i)(A)
FILED	February 17, 2026
CRITICALITY	HIGH — actual trading-mechanics material change

OneChronos's February 17 material amendment is the public statement of its architectural differentiation from every other US ATS. It is essential reading before any comparison of OneChronos against continuous-order-book venues (BIDS, BLUE Ocean, MS POOL, Sigma X).

How OneChronos actually works

- **Periodic call auctions, not continuous matching.** Orders are not matched as they arrive. The ATS holds periodic auctions seeking optimal multilateral matching across all eligible orders.
- **Multilateral matching.** One or more buyers can match against one or more sellers in a single auction. Not bilateral.
- **Per-security uniform transaction price.** Within an auction, all buyers and sellers of a given security pay or receive the same price.
- **Distributed Point-of-Presence (PoP) order entry.** Subscribers enter orders at any of multiple PoPs. Matching happens centrally at Equinix NY5, Secaucus.
- **Nanosecond PoP timestamps.** Order eligibility is determined by PoP arrival time, not matching-engine arrival time. This is a deliberate latency-arbitrage defense.
- **Cutoff Timestamps.** Orders received at a PoP by the Cutoff are eligible for that auction. Late orders roll to the next.
- **No time priority within an auction.** All orders in the same auction are on parity from a time perspective. Price priority and allocation use a defined mechanism.
- **Expressive Bidding.** Subscribers can specify execution constraints spanning a pair of securities (e.g., "execute buy on AAPL only if sell on MSFT also fills"). This is OneChronos's signature feature.

Sapinover-specific implications

Any analysis comparing OneChronos (ONEC) against BIDS, BLUE, or other continuous-matching ATSs must account for the architectural difference. They serve different use cases. Share count and notional alone miss the operational reality. The May 4 ATS-N filing tagged "ATS-N/MA" in EDGAR was actually an administrative update under Rule 304(a)(2)(i)(B); the real material change was this February 17 filing.

BNP Paribas Cortex ATS — Updating Amendment (May 14, 2026)

VENUE	BNP Paribas Securities Corp. — Cortex ATS
FILE NUM	013-00187
FORM	ATS-N/UA — Rule 304(a)(2)(i)(B)
FILED	May 14, 2026
CRITICALITY	MEDIUM — counterparty interaction mechanics changed

EDGAR's full-text search categorized this filing as "ATS-N/OFA" (Order Filing Amendment), but the actual filing label is "ATS-N/UA — Updating Amendment under Rule 304(a)(2)(i)(B)." The substance is updated counterparty interaction logic.

Operational changes

- **Counterparty opt-out structure.** Subscribers can opt out of interacting with specific counterparty types (1–5). Type 1 is opt-out-by-default.
- **Dynamic recategorization.** Orders from Category 4 or 5 Subscribers (the "Direct Low" tiers) are reclassified to Category 3 after the order persists in the order book for 5 milliseconds. Algorithmically softens the toxicity flag for resting orders.
- **Mid Point Peg opt-out.** Now has separate opt-out configuration from non-midpoint orders. Previously coupled by default.
- **Self-cross prevention.** On by default for external broker-dealer Subscribers (matched by MPID). Previously opt-in.

The 5-millisecond dynamic recategorization is the most interesting mechanic — Cortex is using time-resting behavior as a signal that softens an order's pre-assigned toxicity category. Subscribers in higher-categorized tiers can effectively earn their way into broader counterparty access by displaying passive behavior.

Bruce Markets — Correcting Amendment (Apr 6, 2026)

VENUE	Bruce Markets LLC
FILE NUM	013-00206
FORM	ATS-N/CA — Rule 304(a)(2)(i)(C)
FILED	April 6, 2026
CRITICALITY	LOW — fee schedule transparency update

Bruce filed a correcting amendment updating Item 19 (Fees). This is a fee-schedule transparency disclosure, not a trading-mechanics change. Sapinover tracks Bruce as one of three overnight ATS data sources; the filing has no operational impact on the pipeline.

Transaction fees

Tier	Fee structure
Stocks at or above \$1.00 — taking liquidity	\$0.00 to \$0.0020 per executed share
Stocks below \$1.00 — taking liquidity	\$0.00 to 0.30% of notional (30 bps)
Fee discretion	Negotiated per Subscriber. Reduced for early adopters, high historical volume, expected f
Pass-through fees	CAT, SEC Section 31, FINRA TAF (no markup applied)

Market data licensing (new disclosure)

Tier	Monthly fee range
Level 1 + Level 2 non-display (internal use only)	\$5,000 (both tiers)
Level 1 display license	\$7,500 to \$20,000
Level 2 display license	\$10,000 to \$22,000
Last sale price only	\$5,000 to \$7,500

Bruce Markets Holdings (parent) is the market data licensor. The consumer base for this data extends beyond execution counterparties: it includes information portals and financial media (Yahoo Finance, Google Finance, CNBC, Bloomberg, and similar), brokerage front-ends and retail-facing platforms that redistribute ATS data to large user populations, analytics and research providers, and trading firms that consume the data for internal use. The higher tiers in the display ranges correspond to redistribution use cases (downstream audiences in the millions); the lower tiers cover smaller internal-use cases. Pricing within ranges is discretionary based on client type, data usage (display vs non-display), and distribution channel. This is a structural revenue stream parallel

to the market data licensing models at NYSE, Nasdaq, IEX, and other regulated venues; the disclosure simply makes the schedule explicit. For a Bruce-vs-BLUE comparison, the data licensing line is material to the venue revenue mix, but it should not be conflated with execution-side cost to a trading-firm subscriber, which is governed by the transaction-fee schedule above.

Recent FINRA Regulatory Notices

Notice	Title	Effective
26-07 ★	Overnight transaction reporting exception (.W modifier)	Mar 30, 2026
26-10	New intraday margin standards (replaces day trading margin)	TBD
26-11	Interpretations for new intraday margin standard	Jun 4, 2026
26-09	Form NMA (New Member Application) enhancements	Published
26-08	2026 GASB Accounting Support Fee	Published
26-06	Modernizing arbitration rules — comment period	Comment stage

All ATS-N filings — past 60 days

Date	Venue	Form
May 22	Citigroup Global Markets	ATS-N/MMA
May 14	BNP Paribas Securities Corp.	ATS-N/UA
May 12	Interactive Brokers LLC	ATS-N/UA
May 11	Level Markets LLC	ATS-N/MMA
May 8	J.P. Morgan Securities	ATS-N/UA
May 8	Goldman Sachs & Co. (SIGMA X)	ATS-N/UA
May 8	Instinet, LLC	ATS-N/UA
May 7	Intelligent Cross LLC	ATS-N/UA
May 7	Admiral Securities LLC	ATS-N/MMA
May 6	BIDS Trading L.P.	ATS-N/UA
May 4	OneChronos Markets LLC	ATS-N/UA
May 4	Virtu Americas LLC	ATS-N/UA
May 1	Level Markets LLC	ATS-N/UA
Apr 27	UBS Securities LLC	ATS-N/UA
Apr 22	TMX Alpha US, LLC	ATS-N/MMA
Apr 17	National Financial Services (Fidelity)	ATS-N/MMA
Apr 16	Interactive Brokers LLC	ATS-N/MMA
Apr 14	J.P. Morgan Securities	ATS-N/UA
Apr 10	BIDS Trading L.P.	ATS-N/UA

Apr 10	Instinet, LLC	ATS-N/MA
Apr 9	OneChronos Markets LLC	ATS-N/UA
Apr 9	Goldman Sachs & Co. (SIGMA X)	ATS-N/MA
Apr 8	OTC Link LLC	ATS-N/UA
Apr 6	Bruce Markets LLC ★	ATS-N/CA
Apr 3	PureStream, LLC	ATS-N/MA

Methodology. ATS-N filings retrieved from SEC EDGAR via full-text search (efts.sec.gov). FINRA notices retrieved from finra.org. PDF redlines fetched directly and text-extracted via pypdf. All findings cross-verified against actual filing documents. Sapinover does not represent or warrant the accuracy of this content. Nothing herein constitutes legal or investment advice.

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