

# FINANCIAL INFORMATION FORUM

February 19, 2026

**By electronic mail**

Securities and Exchange Commission

100 F Street, NE

Washington, DC 20549

Attn: Kelly Riley, Senior Special Counsel, Division of Trading and Markets

Peggy Sullivan, Senior Policy Advisor, Division of Trading and Markets

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

Dear Ms. Riley and Ms. Sullivan,

The Financial Information Forum (“FIF”) is submitting this letter to the Securities and Exchange Commission (the “Commission”) relating to the obligations of broker-dealers pursuant to the vendor display rule for fractional share trades that will be disseminated by the Securities Information Processors starting on February 23, 2026. FIF is submitting this letter as a follow-up to the letter that FIF submitted to the Commission and the Financial Industry Regulatory Authority (“FINRA”) on February 4, 2026<sup>1</sup> and a subsequent call with you and your colleagues, FIF members and FIF on February 11, 2026. FIF members and FIF would like to thank you and your colleagues for engaging in discussions on this topic on short notice.

FIF conducted a survey of the members of the FIF TRF/ORF Working Group relating to this issue. The survey results are attached as Annex 1 to this letter. The survey results indicate that there are a significant number of broker-dealers that either (i) will not be able to display fractional trade quantities to six decimals starting February 23, 2026 or (ii) will be able to display fractional trade quantities to six decimals starting February 23, 2026 but are concerned that they will not be able to conduct proper testing.

Given the significant number of broker-dealers that are impacted by this issue, FIF members believe that time-limited industry-wide regulatory relief would be appropriate at this time. During an FIF Working

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<sup>1</sup> FIF letter to the Securities and Exchange Commission and the Financial Industry Regulatory Authority (Feb. 4, 2026), available at <https://fif.com/index.php/working-groups/category/271-comment-letters?download=3488:fif-letter-to-the-sec-and-finra-relating-to-sip-fractional-shares-and-the-vendor-display-rule&view=category>.

Group call on February 18, FIF members raised the following additional points that FIF is providing as background information for the Commission (in addition to the points discussed in the February 4 FIF letter):

- Some FIF members do not accept fractional customer orders or execute fractional trades and are concerned that displaying trades to six decimals would create unnecessary confusion for customers.
- Some FIF members would like to offer their customers the option to elect whether the customer wants to view trade executions to six decimals or prefers to view trade executions rounded to the nearest share.
- Broker-dealers must be particularly careful when making changes to customer front-end trading products, including desktop and mobile trading products.

FIF has relayed to Working Group members the statements by Commission representatives during the February 11 call that Commission representatives are open to working with individual firms to potentially provide no-action relief with respect to this issue. FIF members appreciate these statements by Commission representatives. Given the number of firms that are impacted by this issue, FIF members believe that industry-wide relief would be appropriate. FIF understands that this issue is being raised on short notice and appreciates the Commission's consideration of the request for regulatory relief relating to this issue.

Please contact me at [howard.meyerson@fif.com](mailto: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

Cc: Alex Jadin, Division of Trading and Markets, Securities and Exchange Commission  
Eric Juzenas, Division of Trading and Markets, Securities and Exchange Commission  
Leah Mesfin, Division of Trading and Markets, Securities and Exchange Commission  
Andrea Orr, Division of Trading and Markets, Securities and Exchange Commission  
John F. Prochilo III, Division of Trading and Markets, Securities and Exchange Commission  
Julia Zhang, Division of Trading and Markets, Securities and Exchange Commission

**Annex 1**  
**FIF Member Survey on SIP Fractional Shares: Questions and Responses**

**Note regarding survey**

Please note that FIF conducted this survey over a short time period. This survey is not intended to provide a precise number or percentage of broker-dealers impacted by the issue covered by the survey. This survey is instead intended to ascertain whether this issue will impact a significant number of broker-dealers. The survey results indicate that this issue will impact a significant number of broker-dealers.

**Survey questions**

Question 1: Is your firm ready to support the display of fractional share trades to six decimals as of February 23, 2026 (for displaying last sale data to customers pursuant to the vendor display rule)?

1. Yes, and we will have completed proper production testing by that date
2. No
3. We will support this functionality for February 23, but we are concerned that we cannot complete proper production testing by that date

Question 2: For the last sale data to be displayed to customers for the vendor display rule, is your firm obtaining the underlying data from a data vendor or receiving a direct feed from the SIPs?

1. Data vendor
2. Direct feed

Question 3: For firms that responded “1” to Question 2, has the data vendor made the fractional share trade data available to your firm for testing as of February 11?

1. Yes
2. No

**Individual firm survey responses**

Member	Q1	Q2	Q3
Member 1	1	2	N/A
Member 2	2	1	2
Member 3	1	Both	N/A
Member 4	3	1	1
Member 5	1	2	N/A
Member 6	3	2	N/A
Member 7 (trading and operations product vendor that supports (i) two clearing firms, (ii) 53 introducing brokers of one of the clearing firms, and (iii) 9 other introducing brokers that have not separately responded to the survey) [notes: each of these 64 firms is counted separately in the results below; the vendor is not	2	1	2

counted; if a customer of this vendor responded directly to the FIF survey, the customer is excluded from the 64 firms]			
Member 8	2	1	2
Member 9	2	TBD	TBD
Member 10	2	1	2

**Aggregated summary of responses**

	Total	Data vendor	Direct feed	Both	TBD	Data available from data vendor	Data not available from data vendor	N/A	TBD
Ready; testing completed	3		2					2	
				1				1	
Not ready	68	67					67		
					1				1
Ready; concerned about testing	2	1				1			
			1					1	