

SETTING THE STAGE FOR 24X5: Insights from DTCC's Survey

Extended trading hours has the potential to add value, but there are also a wide range of factors that need to be evaluated and addressed to protect the markets.

To better understand industry sentiment and client readiness for extended hours trading, DTCC conducted an anonymized pulse survey in 3Q 2025 on myriad issues around 24x5, including:

- **Forecasting anticipated volumes:** Understanding expected trading activity across extended hours – and the source of that activity.
- **Assessing risk management enhancements:** Identifying additional controls and safeguards needed to support continuous operations.
- **Evaluating membership standards:** Exploring whether current requirements reflect evolving market structures and risk profiles.
- **Identifying key pain points and potential barriers:** Capturing industry sentiment around technical, regulatory and operational barriers.

The survey provided valuable feedback from clients and key stakeholders, and validated DTCC's planned approach to support the industry in this initiative. Respondents showed strong support for DTCC's proactive engagement and readiness initiatives, with most firms expecting a gradual overnight trading volume increase over the next several years.

Further insights and findings from DTCC's Q3 2025 24x5 pulse survey follow.

Survey Methodology:

The online survey was sent to a list of NSCC Members, key stakeholders, broker-dealers, and institutional participants to ensure broad market representation.

Findings were anonymized and aggregated, **with feedback from 95 respondents representing 84 firms** (including 72 full-service NSCC members).

Where possible, direct outreach was also conducted by DTCC Relationship Managers to clarify objectives and encourage thoughtful participation.

Engagement included stakeholders across North America, EMEA, and APAC to reflect the global nature of 24x5 operations.

INSIGHT #1:

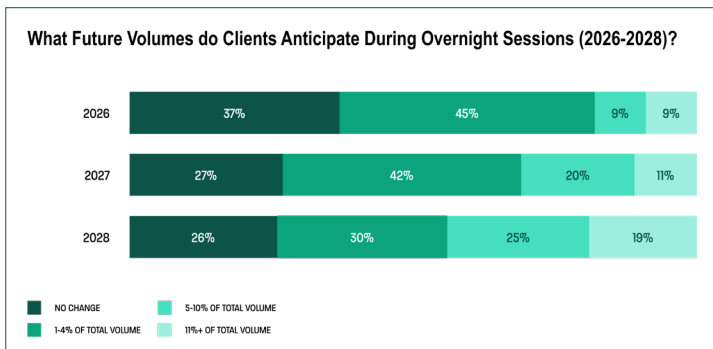
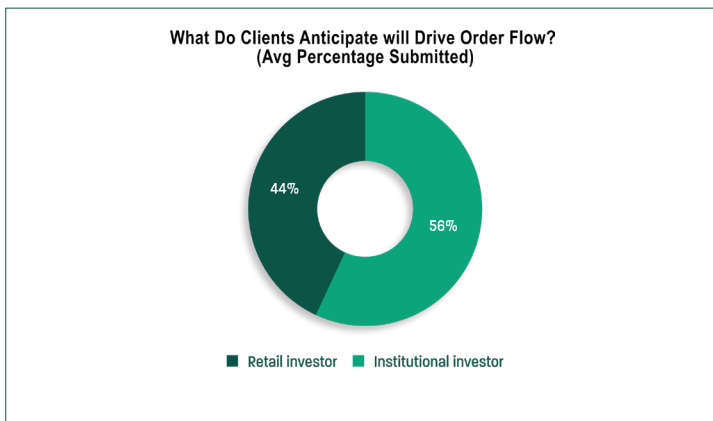
Anticipated Trading Volumes

Key Findings:

Volumes are currently very low in overnight after-market trading and early morning pre-market trading. However, with normalizing extended trading hours as exchanges and alternative trading systems (ATSs) come online, it is expected there will be corresponding changes to trading volume.

Survey respondents anticipate a steady increase in volumes over the next three years, with most overnight trading volume predicted to come from institutional investors. There is also an expectation that retail investors will lead early activity, while institutions will be more active during market stress or strong liquidity.

- Nearly **50% of respondents anticipate 1-10% of total trading volumes** will steadily migrate to overnight sessions by **2028**.
- The majority of respondents (63%) said there will be noticeable volume increases by **2026**, and **74%** predict further growth by **2028**.



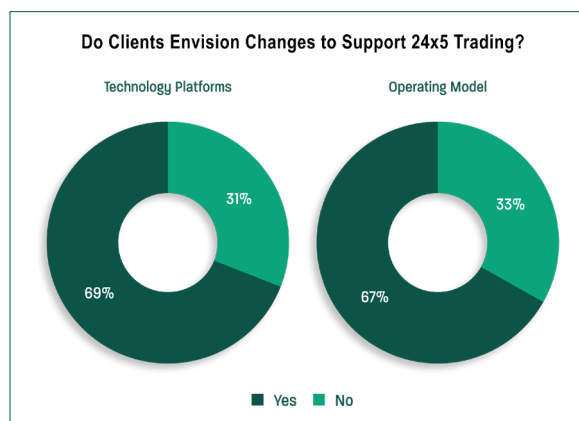
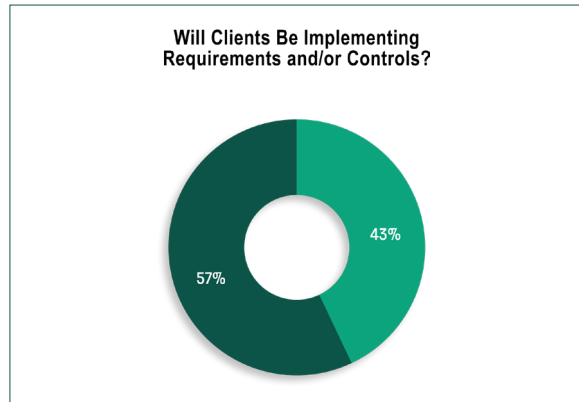
INSIGHT #2:

Client Preparedness for Changes

Key Findings:

Only equities will be in scope for extended-hours trading under the current plan. Respondents expect that their firms will have to make both technology and operational preparations, including implementing various requirements and controls. Some of the preparations identified include:

- Upgrading risk management and technology** - Implementing extended real-time risk monitoring, setting new trade limits, and upgrading platforms to support overnight operations.
- Managing participation and managing liquidity** - Some expect overnight trading to be limited to select accounts, applying minimum volume / liquidity thresholds, and introducing dedicated permissions.
- Strengthening governance and compliance** - Aligning with regulatory requirements, updating procedures, and reviewing controls to ensure compliance during extended trading hours.



INSIGHT #3:

Industry Expectations of DTCC's Leadership

Key Findings:

Survey respondents expressed expectations of DTCC to support 24x5 extended hours trading and are looking to DTCC to lead the 24x5 strategy — providing guidance and alignment to address anticipated challenges for NSCC and Exchanges.

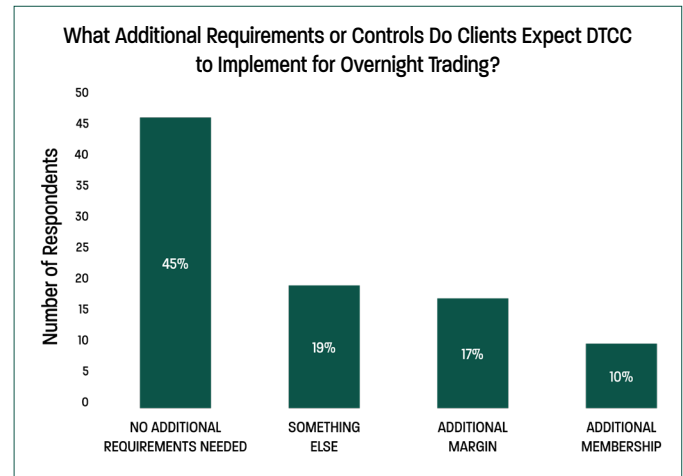
As announced in March, DTCC has committed to deliver on the 24x5 initiative by extending NSCC's clearing hours to support clients and further strengthen the safety and soundness of the markets. NSCC already implemented phase 1 of the extended trading hours schedule in September 2024 by enabling market centers and trading platforms to submit trades at 1:30 AM ET, approximately 2.5 hours earlier. Under plans for phase 2, which is targeted for June 2026, subject to regulatory review and approval of any necessary rule changes, NSCC will operate 24x5, from Sunday at 8:00 PM ET to Friday at 8:00 PM ET.

- **NSCC Go-Live:** NSCC is assessing introducing dedicated authorization agreements (9A/9B) for Specialized Representatives in overnight sessions prior to June 2026. This will be an opt-in model providing Member Firms with additional controls on who can act on their behalf during overnight sessions.
Subject to Board & Regulatory approval.

- **Exchanges Go-Live:** Ahead of the Exchanges Go-Live, NSCC is assessing introducing minimum margin requirements and imposing larger minimum capital requirements for members participating in overnight trading.

Some of the additional requirements and/or controls that DTCC should incorporate, as identified by survey respondents, include:

- **Enhanced risk and default management:** Increase default fund contributions and add alerts for large overnight positions.
- **Stronger controls and attestation:** Implement stronger controls, attestation, and staffing for overnight operations.
- **Technical and operational readiness:** Deliver robust technical solutions and maintain consistent processing for 24x5 trading.
- **Expanded framework and resiliency:** Expand margin and membership frameworks to support extended hours and ensure operational resiliency.
- **Segregation of locked-in agreement processes:** Supports compliance and minimizes potential conflicts.



To continue the conversation:

DTCC's initiative to support extended trading hours is targeted for client testing in January 2026, with a production release planned for June 2026.

As this effort progresses, DTCC will continue to work across the industry to support the alignment of extended trading hours. DTCC welcomes ongoing dialogue with the industry and firms as this initiative continues to evolve.

VISIT DTCC'S 24X5 HUB

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