

CAT CAIS Industry Member Reporting Scenarios

**8/25/2020
Version 1.1.1**

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Executive Summary

This document is a companion document to the CAT Reporting Customer and Account Technical Specifications for Industry Members – LTID (“Technical Specifications”), and is provided to assist Industry Members in implementing the reporting requirements laid out in the Technical Specifications. This document illustrates the specific reporting requirements for a variety of account reporting scenarios as defined in the CAT NMS Plan. The scenarios illustrate the reporting requirements for the LTID Phase. Additional scenarios will be added for Full Customer and Account Reporting when the Technical Specifications are published for that phase.

The reporting scenarios are presented in a separate document from the Technical Specifications to provide the greatest flexibility in the ability to modify or add scenarios as new questions are presented and trading practices evolve. It is expected that changes and additions will be necessary for reporting scenarios with greater frequency than changes to the Technical Specifications that would be required when record format, field value changes, etc., occur. By maintaining a separate reporting scenarios document, reporting scenarios may be clarified or added without the need for a new version of the Technical Specifications.

This document contains interpretive guidance for Industry Member CAT Reporters with respect to how the Technical Specifications must be implemented. As such, any changes to this document are subject to the same review and approval process by the Operating Committee, pursuant to the CAT NMS Plan, as the Technical Specifications.

This document represents a phased approach to industry reporting.

Table 1: Revision / Change Process

Version	Date	Author	Description
DRAFT 1.0	1/27/2020	Consolidated Audit Trail, LLC	Initial draft
1.1.1	8/25/2020	Consolidated Audit Trail, LLC	Addition of <i>fdidEndDateNULL</i> , <i>fdidEndReasonNULL</i> , <i>replacedByFDIDNULL</i> , <i>ltidEndDateNULL</i> , and <i>ltidEndReasonNull</i> attributes Removal of NULL acceptable values from <i>fdidEndDate</i> , <i>fdidEndReason</i> , <i>replacedByFDID</i> , <i>ltidEndDate</i> , and <i>ltidEndReason</i> Modified guidance on nullifying previously populated attributes Addition of Use Cases for Reporting Scenarios

1. Introduction

This document is organized by reporting scenarios, such as reporting a new account, submitting corrections or updates to a previously reported account, and reporting associations of Large Trader IDs (LTIDs) to accounts.

For each scenario, a description of the scenario is provided and then is followed by specific data submission examples, illustrating the correct values to be populated for each field. The data submission examples will not include the Main JSON object entry, as the submission examples are assuming the Main object provided is accurate for the CAT Reporter Firm whose data is being submitted. The examples will all use example firmDesignatedID values.

2. Initial Reporting of Accounts

The sections below describe the key data elements of CAT used in CAT CAIS submission files for initial reporting of accounts. In accordance with the phased implementation schedule, only account data elements are included in the CAIS Technical Specification at this time.

2.1. Account with Large Trader ID

This section illustrates the CAT reporting requirements when an account is identified as being required to report to CAT, where a known Large Trader is associated to the account as an authorized trader. The Industry Member is required to report the account to CAT CAIS, as well as the associated LTID.

Table 2: Account with Large Trader ID

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: ABC123 fdidType: ACCOUNT fdidDate: 20200105
Large Trader Record	largeTraderRecordID: 1 largeTraderID: 12345678-0000 ltidEffectiveDate: 20200105
Result stored in CAIS	firmDesignatedID: ABC123 fdidType: ACCOUNT fdidDate: 20200105 largeTraderID: 12345678-0000 ltidEffectiveDate: 20200105

2.2. Account with two Large Trader IDs

This section illustrates the CAT reporting requirements when an account is identified as being required to report to CAT, where two known Large Traders are associated to the account as authorized traders. The Industry Member is required to report the account to CAT CAIS, as well as the associated LTIDs.

Table 3: Account with two Large Trader IDs

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: XYZ999 fdidType: ACCOUNT fdidDate: 20190501
Large Trader Record	largeTraderRecordID: 1 largeTraderID: 12345678-0000 ltidEffectiveDate: 20190501 largeTraderRecordID: 2 largeTraderID: 99887766-1234 ltidEffectiveDate: 20200101
Result stored in CAIS	firmDesignatedID: XYZ999 fdidType: ACCOUNT fdidDate: 20190501 largeTraderID: 12345678-0000 ltidEffectiveDate: 20190501 largeTraderID: 99887766-1234 ltidEffectiveDate: 20200101

2.3. Relationship with Unknown Large Trader ID

This section illustrates the CAT reporting requirements when a Relationship FDID is identified as being required to report to CAT CAIS, where the FDID has an associated authorized trader identified as an unknown Large Trader.

Table 4: Account with two Large Trader IDs

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: ABC123 fdidType: RELATIONSHIP fdidDate: 20200121
Large Trader Record	largeTraderRecordID: 1 largeTraderID: ULT12345-0000 ltidEffectiveDate: 20200121

JSON Object	Data Submission
Result stored in CAIS	firmDesignatedID: ABC123 fdidType: RELATIONSHIP fdidDate: 20200121 largeTraderID: ULT12345-0000 ltidEffectiveDate: 20200121

2.4. Account with no Large Traders

In this scenario, the CAT Reporting Firm identifies an account that transacts in equity or option securities, where there is no authorized trader present on the account having an LTID. For the LTID phase, the firm is **not** required to report the account to CAT CAIS, however they are able to do so if they choose, in preparation for later phases mandating report of all FDIDs.

Table 5: New Account no Large Traders

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: XYZ999 fdidType: ACCOUNT fdidDate: 20060715
Result stored in CAIS	firmDesignatedID: XYZ999 fdidType: ACCOUNT fdidDate: 20060715

3. Update/Correction of Previously Accepted FDIDs

The sections below describe the key data elements of CAT used in CAT CAIS submission files to update or correct values previously submitted to, and accepted by, CAT CAIS. If a reporting firm determines that data included in the submission was incorrect – but did not result in a data validation error causing the rejection of the submission record – the firm is able to submit a correction to the record in the same method as an update.

3.1. Updating an FDID

This section illustrates the CAT reporting requirements when an account has been previously submitted to, and accepted by, CAT CAIS, and the account is determined to have been changed within the reporting firm’s system on an attribute other than an LTID-to-FDID association. The record is to be included in a submission with the updated attribute data. If no change is required to the LTID-to-FDID association, the firm is not required to include the LTID association in the submission. For purposes of this example, the fdidDate attribute is being updated.

Table 6: Original Submission Example

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: ABC123 fdidType: ACCOUNT fdidDate: 20200121
Large Trader Record	largeTraderRecordID: 1 largeTraderID: 12345678-9999 ltidEffectiveDate: 20200121
Result stored in CAIS	firmDesignatedID: ABC123 fdidType: ACCOUNT fdidDate: 20200121 largeTraderID: 12345678-9999 ltidEffectiveDate: 20200121

Table 7: Update Submission Example

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: ABC123 fdidType: ACCOUNT fdidDate: 20200115
Result stored in CAIS	firmDesignatedID: ABC123 fdidType: ACCOUNT fdidDate: 20200115 largeTraderID: 12345678-9999 ltidEffectiveDate: 20200121

3.2. Update of LTID-to-FDID Association

This section illustrates the CAT reporting requirements when an account has been previously submitted to, and accepted by, CAT CAIS, and the account is determined to have been changed within the reporting firm's system on an attribute of an LTID-to-FDID association other than the Large Trader ID value. The record is to be included in a submission with the updated attribute data, including the LTID-to-FDID association requiring the update. For purposes of this example, the ltidEffectiveDate attribute is being updated.

Table 8: Original Submission Example

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: XYZ999 fdidType: ACCOUNT fdidDate: 20200110
Large Trader Record	largeTraderRecordID: 1 largeTraderID: 12345678-9999 ltidEffectiveDate: 20200121
Result stored in CAIS	firmDesignatedID: XYZ999 fdidType: ACCOUNT fdidDate: 20200110 largeTraderID: 12345678-9999 ltidEffectiveDate: 20200121

Table 9: Update Submission Example

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: XYZ999 fdidType: ACCOUNT fdidDate: 20200110
Large Trader Record	largeTraderRecordID: 1 largeTraderID: 12345678-9999 ltidEffectiveDate: 20200110
Result stored in CAIS	firmDesignatedID: XYZ999 fdidType: ACCOUNT fdidDate: 20200110 largeTraderID: 12345678-9999 ltidEffectiveDate: 20200110

3.3. Ending FDID without Replacing Record

This section illustrates the CAT reporting requirements when an account has been previously submitted to, and accepted by, CAT CAIS, and the account is determined to have been ended within the firm’s system. In accordance with the CAT CAIS Technical Specification document, any LTID-to-FDID associations for the FDID that had not been ended prior to ending the FDID, will be ended at the time the FDID is ended. As such, it is not required to include the LTID-to-FDID associations in the submission with an explicit ending of the association unless the reporting firm determines the End Date of the association is not the same as the End Date of the FDID.

Table 10: Original Submission Example

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: ABC321 fdidType: ACCOUNT fdidDate: 20010910
Large Trader Record	largeTraderRecordID: 1 largeTraderID: 12345678-9999 ltidEffectiveDate: 20180308

JSON Object	Data Submission
Result stored in CAIS	firmDesignatedID: ABC321 fdidType: ACCOUNT fdidDate: 20010910 largeTraderID: 12345678-9999 ltidEffectiveDate: 20180308

Table 11: Ending Submission Example

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: ABC321 fdidType: ACCOUNT fdidDate: 20010910 fdidEndDate: 20200130 fdidEndReason: ENDED
Result stored in CAIS	firmDesignatedID: ABC321 fdidType: ACCOUNT fdidDate: 20010910 fdidEndDate: 20200130 fdidEndReason: ENDED largeTraderID: 12345678-9999 ltidEffectiveDate: 20180308 ltidEndDate: 20200130 ltidEndReason: ENDED

3.4. Ending FDID with Replacing Record

This section illustrates the CAT reporting requirements when an account has been previously submitted to, and accepted by, CAT CAIS, and the account is determined to have been ended within the firm’s system by being replaced with a different FDID. In accordance with the CAT CAIS Technical Specification document, any LTID-to-FDID associations for the FDID that had not been ended prior to ending the FDID, will be ended at the time the FDID is ended. As such, it is not required to include the LTID-to-FDID associations in the submission with an explicit ending of the association unless the reporting firm determines the End Date of the association is not the same as the End Date of the FDID. The associations will not be moved to the replacing FDID record, and as such the firm must explicitly establish the LTID-to-FDID associations to the replacing FDID.

Table 12: Original Submission Example

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: XYZ444 fdidType: ACCOUNT fdidDate: 20010910
Large Trader Record	largeTraderRecordID: 1 largeTraderID: 12345678-9999 ltidEffectiveDate: 20180308
Result stored in CAIS	firmDesignatedID: XYZ444 fdidType: ACCOUNT fdidDate: 20010910 largeTraderID: 12345678-9999 ltidEffectiveDate: 20180308

Table 13: Replacing Submission Example

JSON Object	Data Submission
FDID Record 1 Entry	fdidRecordID: 1 firmDesignatedID: XYZ444 fdidType: ACCOUNT fdidDate: 20010910 fdidEndDate: 20200130 fdidEndReason: REPLACED replacedByFDID: ABC888
FDID Record 2 Entry	fdidRecordID: 2 firmDesignatedID: ABC888 fdidType: ACCOUNT fdidDate: 20200130
Large Trader Record for FDID Record 2	largeTraderRecordID: 1 largeTraderID: 12345678-9999 ltidEffectiveDate: 20200130
Result stored in CAIS	Record 1 firmDesignatedID: XYZ444 fdidType: ACCOUNT fdidDate: 20010910 fdidEndDate: 20200130 fdidEndReason: REPLACED

JSON Object	Data Submission
	replacedByFDID: ABC888 largeTraderID: 12345678-9999 ltidEffectiveDate: 20180308 ltidEndDate: 20200130 ltidEndReason: ENDED Record 2 firmDesignatedID: ABC888 fdidType: ACCOUNT fdidDate: 20200130 largeTraderID: 12345678-9999 ltidEffectiveDate: 20200130

3.5. Reactivate an ended FDID

This section illustrates the CAT reporting requirements when an account has been previously submitted to, and accepted by, CAT CAIS, and subsequently ended for a reason other than REPLACED in a later submission. The firm can accomplish this by including the fdidEndDateNULL and fdidEndReasonNULL attributes with true values. The firm will also need to establish any necessary LTID-to-FDID associations in the reactivating submission.

Table 14: Ending Submission Example

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: ABC999 fdidType: ACCOUNT fdidDate: 20010910 fdidEndDate: 20200130 fdidEndReason: ENDED
Result stored in CAIS	firmDesignatedID: ABC999 fdidType: ACCOUNT fdidDate: 20010910 fdidEndDate: 20200130 fdidEndReason: ENDED largerTraderID: 12345678-9999 ltidEffectiveDate: 20180308 ltidEndDate: 20200130

JSON Object	Data Submission
	ltidEndReason: ENDED

Table 15: Reactivating Submission Example

JSON Object	Data Submission
FDID Record 1 Entry	fdidRecordID: 1 firmDesignatedID: ABC999 fdidType: ACCOUNT fdidDate: 20010910 fdidEndDateNULL: true fdidEndReasonNULL: true
Large Trader Record	largeTraderRecordID: 1 largeTraderID: 12345678-9999 ltidEffectiveDate: 20180308 ltidEndDateNULL: true ltidEndReasonNULL: true
Result stored in CAIS	firmDesignatedID: ABC999 fdidType: ACCOUNT fdidDate: 20010910 largeTraderID: 12345678-9999 ltidEffectiveDate: 20180308

3.6. Ending an LTID-to-FDID Association

This section illustrates the CAT reporting requirements when an account has been previously submitted to, and accepted by, CAT CAIS, and one of the LTIDs associated to the FDID is determined to no longer be an authorized trader for the account. If more than one LTID is associated to the FDID, only the LTID(s) requiring update are required to be included in the submission, and any associations not included in the submission will not be affected by the submission. Furthermore, if the LTID is associated to any other FDIDs, those associations to other FDIDs will not be ended through this submission. If any of those other associations are to be ended, they must be excluded with explicit submission entries.

Table 16: Original Submission Example

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: ZZZ999 fdidType: ACCOUNT fdidDate: 20010910
Large Trader Record	largeTraderRecordID: 1 largeTraderID: 12345678-9999 ltidEffectiveDate: 20180308 largeTraderRecordID: 2 largeTraderID: 98765432-0001 ltidEffectiveDate: 20190616
Result stored in CAIS	firmDesignatedID: ZZZ999 fdidType: ACCOUNT fdidDate: 20010910 largerTraderID: 12345678-9999 ltidEffectiveDate: 20180308 largerTraderID: 98765432-0001 ltidEffectiveDate: 20190616

Table 17: Update Submission Example

JSON Object	Data Submission
FDID Record 1 Entry	fdidRecordID: 1 firmDesignatedID: ZZZ999 fdidType: ACCOUNT fdidDate: 20010910
Large Trader Record	largeTraderRecordID: 1 largeTraderID: 12345678-9999 ltidEffectiveDate: 20180308 ltidEndDate: 20200120 ltidEndReason: ENDED
Result stored in CAIS	firmDesignatedID: ZZZ999 fdidType: ACCOUNT fdidDate: 20010910 largerTraderID: 12345678-9999 ltidEffectiveDate: 20180308 ltidEndDate: 20200120

JSON Object	Data Submission
	ltidEndReason: ENDED largerTraderID: 98765432-0001 ltidEffectiveDate: 20190616

3.7. Replacing an LTID-to-FDID Association

This section illustrates the CAT reporting requirements when an account has been previously submitted to, and accepted by, CAT CAIS, and one of the LTIDs associated to the FDID is determined to no longer be an authorized trader for the account because the LTID has been replaced with a new value. If more than one LTID is associated to the FDID, only the LTID(s) requiring update are required to be included in the submission, and any associations not included in the submission will not be affected by the submission. Furthermore, if the LTID is associated to any other FDIDs, those associations to other FDIDs will not be ended through this submission. If any of those other associations are to be ended, they must be excluded with explicit submission entries. It is not required to state what LTID the original value was replaced by.

Table 18: Original Submission Example

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: QRS456 fdidType: ACCOUNT fdidDate: 20010910
Large Trader Record	largeTraderRecordID: 1 largeTraderID: ULT99999-0000 ltidEffectiveDate: 20180308
Result stored in CAIS	firmDesignatedID: QRS456 fdidType: ACCOUNT fdidDate: 20010910 largerTraderID: ULT99999-0000 ltidEffectiveDate: 20180308

Table 19: Update Submission Example

JSON Object	Data Submission
FDID Record 1 Entry	fdidRecordID: 1 firmDesignatedID: QRS456 fdidType: ACCOUNT fdidDate: 20010910
Large Trader Record	largeTraderRecordID: 1 largeTraderID: ULT99999-0000 ltidEffectiveDate: 20180308 ltidEndDate: 20200120 ltidEndReason: REPLACED largeTraderRecordID: 2 largeTraderID: 98765432-0001 ltidEffectiveDate: 20200120
Result stored in CAIS	firmDesignatedID: QRS456 fdidType: ACCOUNT fdidDate: 20010910 largeTraderID: ULT99999-0000 ltidEffectiveDate: 20180308 ltidEndDate: 20200120 ltidEndReason: REPLACED largeTraderID: 98765432-0001 ltidEffectiveDate: 20200120

4. Correction of Rejected FDIDs

The sections below describe the key data elements of CAT used in CAT CAIS submission files, where the submission record was rejected for a data validation error, necessitating the firm either resubmit the same FDID record with corrected data, or submitting a Correction Action indicating the firm has submitted a different record to correct for the rejected record or a delete action indicating the rejected error was an erroneous submission.

4.1. Correction of a Rejection by Resubmission

This section illustrates the CAT reporting requirements when an FDID was submitted with data causing a data validation error, and the firm is able to correct for the erroneous submission by resubmitting the same FDID with corrected data. For purposes of this scenario, the example includes an erroneous inclusion of an `fdidEndDate` without a corresponding `fdidEndReason`, where the firm did not intend to end the FDID. Additionally, the original error was noted as `rejectionID 100` in the status file for the original rejected submission, but because the firm is able to correct by resubmitting the same FDID with corrected data, they are not required to include the `rejectionID` in the submission.

Table 20: Rejected Submission Example

JSON Object	Data Submission
FDID Record	<code>fdidRecordID: 1</code> <code>firmDesignatedID: X5RST</code> <code>fdidType: ACCOUNT</code> <code>fdidDate: 20200110</code> <code>fdidEndDate: 20211231</code>
Large Trader Record	<code>largeTraderRecordID: 1</code> <code>largeTraderID: 12345678-9999</code> <code>ltidEffectiveDate: 20200121</code>
Result stored in CAIS	

Table 21: Correction Submission Example

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: X5RST fdidType: ACCOUNT fdidDate: 20200110
Large Trader Record	largeTraderRecordID: 1 largeTraderID: 12345678-9999 ltidEffectiveDate: 20200121
Result stored in CAIS	firmDesignatedID: X5RST fdidType: ACCOUNT fdidDate: 20200110 largerTraderID: 12345678-9999 ltidEffectiveDate: 20200121

4.2. Correction of a Malformed FDID

This section illustrates the CAT reporting requirements when an FDID was submitted with data causing a data validation error, and the firm is not able to correct for the erroneous submission by resubmitting the same FDID with corrected data. The first example for this scenario includes a malformed FDID value, where the firm is correcting the error by including an appropriate FDID for the correction. For purposes of this example, the original error was noted as rejectionID 200 in the status file for the original rejected submission. Because the firm is not able to correct this error by resubmitting the same FDID value, they are required to include the rejectionID and correctingFirmDesignatedID values to resolve the error.

Table 22: Rejected Submission Example

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: !!MalformedFDID!! fdidType: ACCOUNT fdidDate: 20200110
Large Trader Record	largeTraderRecordID: 1 largeTraderID: 12345678-9999 ltidEffectiveDate: 20200121

JSON Object	Data Submission
Result stored in CAIS	

Table 23: Correction Submission Example

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: 999ASDF fdidType: ACCOUNT fdidDate: 20200110
Large Trader Record	largeTraderRecordID: 1 largeTraderID: 12345678-9999 ltidEffectiveDate: 20200121
Correction Action	rejectionID: 200 correctionAction: CORRECTION correctingFirmDesignatedID: 999ASDF
Result stored in CAIS	firmDesignatedID: 999ASDF fdidType: ACCOUNT fdidDate: 20200110 largeTraderID: 12345678-9999 ltidEffectiveDate: 20200121

If the reporting firm determines that the malformed FDID was the result of a data entry error, and that there was no true FDID that should have been reported, they are able to correct for the error through the DELETE action, as shown in the following example. For purposes of this example, the original error was noted as rejectionID 999 in the status file for the original rejected submission. No data is stored in CAIS about the record, other than the fact the rejection occurred and the timeline for correction, so the **Result stored in CAIS** section is not included below.

Table 24: Rejected Submission Example

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: !!@#(())

Table 25: Correction Submission Example

JSON Object	Data Submission
Correction Action	rejectionID: 999 correctionAction: DELETE

4.3. Correction of a Malformed LTID

This section illustrates the CAT reporting requirements when an FDID was submitted with a malformed LTID association causing a data validation error, and the firm is able to correct for the erroneous submission by resubmitting the same FDID with a corrected LTID association. The first example for this scenario includes a malformed LTID value, where the firm is correcting the error by including an appropriate LTID for the correction. For purposes of this example, the original error was noted as rejectionID 1000 in the status file for the original rejected submission. Because the firm is not able to correct this error by resubmitting the same FDID and LTID values, they are required to include the rejectionID, correctingFirmDesignatedID, and correctingLargeTraderID values to resolve the error.

Table 26: Rejected Submission Example

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: RSTU999 fdidType: ACCOUNT fdidDate: 20200110

JSON Object	Data Submission
Large Trader Record	largeTraderRecordID: 1 largeTraderID: LTIDVALU ltidEffectiveDate: 20200121
Result Stored in CAIS	

Table 27: Correction Submission Example

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: RSTU999 fdidType: ACCOUNT fdidDate: 20200110
Large Trader Record	largeTraderRecordID: 1 largeTraderID: 12345678-9999 ltidEffectiveDate: 20200121
Correction Action	rejectionID: 1000 correctionAction: CORRECTION correctingFirmDesignatedID: RSTU999 correctingLargeTraderID: 12345678-9999
Result Stored in CAIS	firmDesignatedID: RSTU999 fdidType: ACCOUNT fdidDate: 20200110 largerTraderID: 12345678-9999 ltidEffectiveDate: 20200121

If the reporting firm determines that the malformed LTID was the result of a data entry error, and that there was no true LTID that should have been reported, they are able to correct for the error through the DELETE action, as shown in the following example. For purposes of this example, the original error was noted as rejectionID 5999 in the status file for the original rejected submission.

Table 28: Rejected Submission Example

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: MNOP fdidType: ACCOUNT fdidDate: 20200110
Large Trader Record	largeTraderRecordID: 1 largeTraderID: BROKENLNK ltidEffectiveDate: 20200120
Result Stored in CAIS	

Table 29: Correction Submission Example

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: MNOP fdidType: ACCOUNT fdidDate: 20200110
Correction Action	rejectionID: 5999 correctionAction: DELETE
Result Stored in CAIS	firmDesignatedID: MNOP fdidType: ACCOUNT fdidDate: 20200110

4.4. Correction over Multiple Submissions

This section illustrates the CAT reporting requirements when an FDID was submitted with an error in the original submission, where the firm corrected the original submission error but introduced a further error for the FDID. In accordance with the CAT NMS plan and as detailed in the CAT CAIS technical specification, the timeframe for error correction is not reset after the original error is corrected; it is retained until all errors for the FDID are corrected and the data has been accepted in to CAT CAIS. For the following example, the original error is caused by an invalid fdidType value.

Table 30: Original Rejected Submission Example

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: ZCBX fdidType: UNKNOWN fdidDate: 20200110
Large Trader Record	largeTraderRecordID: 1 largeTraderID: 12345678-5000 ltidEffectiveDate: 20200121
Result Stored in CAIS	

Following the original submission, which resulted in a data validation error for the invalid fdidType, the firm submits a second file. In this submission, they correct the fdidType error, however there is a new data validation error resulting from a missing fdidDate attribute. The timeframe for error correction continues, as the firm did not have a clean submission of the FDID in this correction submission.

Table 31: Initial Correction Submission Example

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: ZCBX fdidType: ACCOUNT
Large Trader Record	largeTraderRecordID: 1 largeTraderID: 12345678-9999 ltidEffectiveDate: 20200121
Result Stored in CAIS	

In this final submission, the firm corrects for the fdidDate error in the initial correction submission, and has a clean submission of the FDID record. Once the FDID has been accepted by CAT CAIS, the rejections are noted as corrected. If the firm submits the same FDID in the future with a data validation error, a new timeframe for correction will be initiated at that time.

32: Final Correction Submission Example

JSON Object	Data Submission
FDID Record	fdidRecordID: 1 firmDesignatedID: ZCBX fdidType: ACCOUNT fdidDate: 20200110
Large Trader Record	largeTraderRecordID: 1 largeTraderID: 12345678-9999 ltidEffectiveDate: 20200121
Result Stored in CAIS	firmDesignatedID: ZCBX fdidType: ACCOUNT fdidDate: 20200110 largerTraderID: 12345678-9999 ltidEffectiveDate: 20200121

5. LTID Phase of CAIS - Reporting Scenario Questions and Answers

Note – for all Questions and Answers, dates are asserted to be in the year 2021, and all times are asserted to be Eastern.

5.1. LTID with No CAT Reportable Activity

Question: An LTID is associated with an account on May 5. The account has never had, and does not ever have, any CAT reportable activity. Is this account and LTID required to be reported to CAIS?

Answer: No. The account may be voluntarily reported to CAIS, but it is not required to be reported, since it does not engage in any CAT reportable activity.

5.2. New LTID Account with CAT Reportable Activity Same Day

Question: A Broker opens an account that has an associated LTID on May 5. The client places a CAT reportable order on May 5 at 10 a.m. Eastern. Is this account and LTID reportable to CAIS? If so, by when?

Answer: Yes, the account must be reported to CAIS because it has CAT reportable activity. The account and associated LTID must be reported to CAIS by 8 a.m. Eastern on May 6.

5.3. New LTID Account with CAT Reportable Activity on a Later Date

Question: A Broker opens an account that has an associated LTID on May 5. The client places a CAT-reportable order on June 2 at 10 a.m. Is this account and LTID reportable to CAIS? If so, by when?

Answer: Yes, the account must be reported to CAIS once it has CAT reportable activity. The account and associated LTID must be reported to CAIS by 8 a.m. on June 3.

5.4. New LTID Account with CAT Reportable Activity on a Later Date after 4:15 p.m.

Question: A Broker opens an account that has an associated LTID on May 5. The client places a CAT reportable order on June 2 at 4:30 p.m. Is this account and LTID reportable to CAIS? If so, by when?

Answer: Yes, the account must be reported to CAIS once it has CAT reportable activity. The account and associated LTID must be reported to CAIS by 8 a.m. on June 4.

5.5. CAT Reporting Activity that does not have an FDID

Question: Broker Dealer A, who is trading in an account with an associated LTID, routes an order to Broker Dealer B. Broker Dealer B routes the order to an exchange. In this simple scenario, Broker Dealer A reports a MENO and MEOR to CAT. Broker Dealer B reports an MEOA and MEOR to CAT. What are the CAIS reporting obligations of each Broker Dealer?

Answer: Broker Dealer A must report the account to CAIS because of reporting the MENO, which contains an FDID with an associated LTID. Broker Dealer B has no CAIS reporting obligation in this scenario because Broker Dealer B is not reporting an FDID on their events.

5.6. Activity which has FDID and LTIDs Associated

Question: Broker Dealer A, who is trading in an account with an associated LTID (Account A), routes an order to Broker Dealer B. Broker Dealer B internalized the order and trades from its own account (Account B) to fill the order. Broker Dealer B's account has an LTID associated with it. In this scenario, Broker Dealer A reports a MENO and MEOR to CAT. Broker Dealer B reports an MEOA and MEOT to CAT. What are the CAIS reporting obligations of each Broker Dealer?

Answer: Both Broker Dealers have reporting obligations to CAIS in this scenario. Broker Dealer A would have to report Account A to CAIS because of reporting a MENO, which contains an FDID with an LTID. Broker Dealer B would have to report Account B to CAIS because of reporting a MEOT, which contains an FDID with an LTID.

5.7. LTID Update to FDID Previously Reported to CAIS

Question: An FDID with an associated LTID 12345678 was reported to CAIS on May 5. On June 15 at 10 a.m., LTID 98765432 is added to the account with an LTID Effect Date of June 15. Is this account and LTID reportable to CAIS? If so, by when?

Answer: Yes, the new LTID added to the account must be reported to CAIS by June 16 at 8 a.m.

5.8. New Account Allocation Event

Question: A new account is opened on May 5 with a non-self-clearing firm that utilizes a Reporting Agent to report into CAIS. The new account has an existing associated Authorized Trader who already has an LTID for many other CAIS reported accounts as well. On May 5, the Authorized Trader buys a block of stock. The stock is allocated to every account for which she is an Authorized Trader on May 6, including the new account. Is this new account required to be reported to CAIS? If so, by when?

Answer: Yes, the new account must be reported to CAIS. Because the Authorized Trader has accounts already established in CAIS, no additional reporting related to the execution by the Authorized Trader is required. However, the new account which received part of the allocation must be reported to CAIS within T+1 from when the allocation into the account occurred, using the same 4:15 p.m. guideline to determine “T” date. In this case, the new account must be reported to CAIS by 8:00 a.m. on May 7, since the allocation occurred on May 6.

5.9. Reporting Agent Certification

Question: A Reporting Agent is reporting on behalf of five Broker Dealers, which have the following counts of CAIS-reportable accounts with LTIDs. What is required of the Reporting Agent for CAIS certification?

Firm 1 – 50 accounts

Firm 2 – 30 accounts

Firm 3 – 25 accounts

Firm 4 – 10 accounts

Firm 5 – 1 account

Firm 6 – 0 accounts

Answer: The Clearing Agent must submit at least 100 of their accounts to meet the certification success criteria. The certification must include at least one account from each of Firms 1-5. Assuming certification success criteria is met, only Firms 1-5 will be certified. Because Firm 6 has no CAIS-reportable activity, Firm 6 would not be certified.