

CAT Q3 2020

Quarterly Progress Report

FILED OCTOBER 30, 2020

UPDATED JANUARY 29, 2021

APPENDIX C MILESTONES

	Implementation Plan Completion Date	Targeted Completion Date or Actual Completion Date¹	Milestone/Interim Step²	Description of Any Variance From the IP	Other Factual Indicators³	Description of Status as of 9/30/2020⁴
1	6/22/2020	6/22/2020	Interim Step: Production Go-Live for Equities 2a file submission and data integrity validation (Large Industry Members and Small OATS Reporters)	N/A	N/A	Completed
2	7/20/2020	7/20/2020	Interim Step: Production Go-Live for Options 2b file submission and data integrity validations	N/A	N/A	Completed
3	7/27/2020	7/27/2020	Interim Step: Production Go-Live for Equities 2a Intrafirm Linkage validations	N/A	N/A	Completed
4	8/24/2020	8/24/2020	Interim Step: Production Go-Live for Options 2b Intrafirm Linkage validations (Large Industry Members)	N/A	N/A	Completed
5	10/26/2020	10/26/2020	Interim Step: Production Go-Live for Firm to Firm Linkage validations for Equities 2a (Large Industry Members and Small OATS Reporters)	N/A	On track for completion <ul style="list-style-type: none"> • Test environment opened for firm to firm linkage validations (Release 3 – Interfirm Linkage) for equities 2a on July 27, 2020 • Production environment opened for firm to firm linkage validations (Release 3 – 	In progress

¹ The “Completion Date” indicates the targeted completion date for the milestone, unless the status for the milestone has been designated as “Completed.” In that case, the “Completion Date” indicates the date by which the milestone was completed.

² To further enhance the publicly available information, the Participants have included additional details in this document to reflect certain interim steps not included in the Implementation Plan to complete implementation of the CAT. These interim steps are provided for informational purposes only and are not relevant for purposes of assessing the Participants’ timely satisfaction of the Financial Accountability Milestones.

³ For milestones that are in progress or have not been initiated, this will include the basis for making the adjustment and the impact of this adjustment on any other Implementation Milestone, and, if applicable, any other factual indicators that demonstrate the current level of completion with respect to the Implementation Milestone.

⁴ This Quarterly Progress Report reflects activities by the Participants to meet the relevant milestones and interim steps. Additional information and metrics on Industry Member testing and readiness are provided in industry update meetings and related materials. See CAT Event Materials, available at <https://catnmsplan.com/events/materials>.

	Implementation Plan Completion Date	Targeted Completion Date or Actual Completion Date ¹	Milestone/Interim Step ²	Description of Any Variance From the IP	Other Factual Indicators ³	Description of Status as of 9/30/2020 ⁴
					Interfirm Linkage) for equities 2a on August 10, 2020	
6	10/26/2020	10/26/2020	Interim Step: Production Go-Live for Equities 2a Exchange and TRF Linkage validations (Large Industry Members and Small OATS Reporters)	N/A	On track for completion <ul style="list-style-type: none"> • Test environment opened for equities 2a exchange and TRF linkage validations (Release 4 – TRF/Exchange Linkage) on September 9, 2020 • Production environment opened for equities 2a exchange and TRF linkage validations (Release 4 – TRF/Exchange Linkage) on September 28, 2020 	In progress
7	11/30/2020	11/30/2020	Row 8 of App. C-10(a): Technical Specifications Published for Phase 2d ⁵	N/A	On track for completion <ul style="list-style-type: none"> • Published updates to draft Industry Member Technical Specifications (2d) on August 11, 2020 and September 9, 2020 	In progress
8	1/4/2021	1/4/2021	Row 3 of App. C-10(c): FCAT Plan Processor creates linkages of the lifecycle of order events based on the received data through Phase 2b	N/A	On track for completion <ul style="list-style-type: none"> • Test environment opened for options 2b exchange linkage validations (Release 4 – 	In progress

⁵ The Participants plan to submit a request for exemptive relief to require the reporting of OTC Link messages in Phase 2d.

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					<p>TRF/Exchange Linkage) on September 9, 2020.</p> <ul style="list-style-type: none"> • Production environment opened for options 2b exchange linkage validations (Release 4 – TRF/Exchange Linkage) on September 28, 2020 • Phase 2b linkages were released into production concurrently with the Phase 2a linkages. All required linkages went into production by September 28, 2020. 	
9	1/4/2021	1/4/2021	Interim Step: Production Environment Go-Live for Firm to Firm Linkage Validations for Options 2b (Large Industry Members)	N/A	<p>On track for completion</p> <ul style="list-style-type: none"> • Phase 2b linkages were released into production concurrently with the Phase 2a linkages. All required linkages went into production by September 28, 2020. 	In Progress
10	1/4/2021	1/4/2021	Interim Step: Production Environment Go-Live for Options 2b Exchange Linkage validation (Large Industry Members)	N/A	<p>On track for completion</p> <ul style="list-style-type: none"> • Phase 2b linkages were released into production concurrently with the Phase 	In progress

	Implementation Plan Completion Date	Targeted Completion Date or Actual Completion Date ¹	Milestone/Interim Step ²	Description of Any Variance From the IP	Other Factual Indicators ³	Description of Status as of 9/30/2020 ⁴
					2a linkages. All required linkages went into production by September 28, 2020.	
11	1/29/2021	1/29/2021	Row 4 of App. C-10(a): Full CAIS Final Technical Specification Published	N/A	<p>On track for completion</p> <ul style="list-style-type: none"> CAT Reporting Customer & Account Technical Specifications for Industry Members – CCID Draft (v.2.0) was published on June 30, 2020. The second draft of the CAT Reporting Customer & Account Technical Specifications for Industry Members – CCID Draft (v.2.0) was published on December 1, 2020. 	In progress
12	1/31/2021	1/31/2021	Row 10 of App. C-10(b) & Row 13 of App. C-10(b): FCAT Plan Processor makes Phase 2c testing environment available	N/A	<p>On track for completion</p> <ul style="list-style-type: none"> Updated Industry Member Technical Specifications (2c) was published on August 11, 2020 Updated Industry Member Technical Specifications (2c) was published on September 9, 2020 	In progress

	Implementation Plan Completion Date	Targeted Completion Date or Actual Completion Date ¹	Milestone/Interim Step ²	Description of Any Variance From the IP	Other Factual Indicators ³	Description of Status as of 9/30/2020 ⁴
13	1/31/2021	1/31/2021	Row 11 of App. C-10(b) & Row 14 of App. C-10(b): FCAT Plan Processor and Industry Members begin testing for 2c reporting	N/A	On track for completion <ul style="list-style-type: none"> See "Other Factual Indicators" for Row 12 	In progress
14	4/26/2021	4/26/2021	Interim Step: Production Go-Live for Equities 2c reporting requirements (Large Industry Members)	N/A	On track for completion <ul style="list-style-type: none"> See "Other Factual Indicators" for Row 12 	In progress
15	4/26/2021	4/26/2021	Interim Step: LTID Account Information Reporting Go-Live for Phases 2a, 2b and 2c (Large Industry Members)	N/A	On track for completion <ul style="list-style-type: none"> CAIS LTID Certification opened on October 5, 2020. 	In progress
16	6/30/2021	6/30/2021	Row 10 of App. C-10(b) & Row 13 of App. C-10(b): FCAT Plan Processor makes Phase 2d testing environment available	N/A	N/A	On track to commence
17	6/30/2021	6/30/2021	Row 11 of App. C-10(b) & Row 14 of App. C-10(b): FCAT Plan Processor and Industry Members begin testing for 2d reporting	N/A	N/A	On track to commence
18	12/13/2021	12/13/2021	Row 3 of App. C-10(c) & Row 5 of App. C-10(c): FCAT Plan Processor creates linkages of the lifecycle of order events based on the received data through Phase 2d	N/A	N/A	On track to commence
19	12/13/2021	12/13/2021	Interim Step: Production Go-Live for Options 2d reporting requirements (Large Industry Members)	N/A	N/A	On track to commence
20	12/13/2021	12/13/2021	Interim Step: Production Go-Live for Equities 2a reporting requirements (Small Non-OATS Reporters)	N/A	N/A	On track to commence
21	12/13/2021	12/13/2021	Interim Step: Production Go-Live for Options 2b reporting requirements (Small OATS Reporters and Small Non-OATS Reporters)	N/A	N/A	On track to commence
22	12/13/2021	12/13/2021	Interim Step: Production Go-Live for Equities 2c reporting requirements (Small OATS Reporters and Small Non-OATS Reporters)	N/A	N/A	On track to commence
23	12/13/2021	12/13/2021	Interim Step: Production Go-Live for Options 2d reporting requirements (Small OATS Reporters and Small Non-OATS Reporters)	N/A	N/A	On track to commence

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24	12/13/2021	12/13/2021	Interim Step: LTID Account Information Reporting Go-Live for Phases 2d (Large Industry Members)	N/A	N/A	On track to commence
25	12/13/2021	12/13/2021	Interim Step: LTID Account Information Reporting Go-Live for Phases 2a, 2b, 2c and 2d (Small Industry Members)	N/A	N/A	On track to commence
26	1/31/2022	1/31/2022	Row 5 of App. C-10(a) & Row 7 of App. C-10(a): Customer Account Information – Test Environment Opens (All Industry Members)	N/A	N/A	On track to commence
27	7/11/2022	7/11/2022	Row 6 of App. C-10(a) & Row 8 of App. C-10(a): Customer and Account Information – Production Environment Go-Live (All Industry Members)	N/A	N/A	On track to commence

PARTICIPANT MILESTONES

	Implementation Plan Completion Date	Targeted Completion Date or Actual Completion Date	Milestones	Description of Any Variance From the IP	Other Factual Indicators	Description of Status as of 9/30/2020
1	7/31/2020	4/30/2021	Release 7: Equity Transition from RSA Specifications to CAT Participant Technical Specifications	N/A	On track for completion <ul style="list-style-type: none"> • Drafting of Plan Participant Release 7 Technical Specification underway 	In Progress
2	4/26/2021	4/26/2021	Section 8.1.1 of Appendix D of the CAT NMS Plan discusses the requirements of the OTQT. Specifically, that section states: The online targeted query tool will provide authorized users with the ability to retrieve processed and/or validated (unlinked) data via an online query screen that includes the ability to choose from a variety of pre-defined selection criteria. Targeted queries must include date(s) and/or time range(s), as well as one or more of a variety of fields, including the following: ...CAT Reporter correction rate over time.	N/A	On track for completion <ul style="list-style-type: none"> • Plan Participants filed request for exemption with the SEC on December 1, 2020 to permit completion of this item by April 26, 2021 	In Progress

FINANCIAL ACCOUNTABILITY MILESTONES

	Implementation Plan Completion Date	Targeted Completion Date or Actual Completion Date	Milestones	Description of Any Variance From the IP	Other Factual Indicators	Description of Status as of 9/30/2020
1	7/31/2020	7/20/2020	FAM Period 1 Completion of Initial Industry Member Core Equity and Option Reporting, defined under CAT NMS Plan Section 1.1 as the reporting by Industry Members (excluding Small Industry Members that are not OATS reporters) of both: (a) equities transaction data, excluding Customer Account Information, Customer-ID, and Customer Identifying Information; and (b) options transaction data, excluding Customer Account Information, Customer-ID, and Customer Identifying Information.	N/A	N/A	Completed
2	12/31/2020	12/31/2020	FAM Period 2 Completion of Full Implementation of Core Equity Reporting, defined under CAT NMS Plan Section 1.1 as the point at which: (a) Industry Member reporting (excluding reporting by Small Industry Members that are not OATS reporters) for equities transactions, excluding Customer Account Information, Customer-ID, and Customer Identifying Information, is developed, tested, and implemented at a 5% Error Rate or less and with sufficient intra-firm linkage, inter-firm linkage, national securities exchange linkage, and trade reporting facilities linkage to permit the Participants and the Commission to analyze the full lifecycle of an order across the national market system, excluding linkage of representative orders, from order origination through order execution or order cancellation; and	N/A	On track to be met ⁶ <ul style="list-style-type: none"> Production Go-Live for Equities 2a Intrafirm Linkage validations on July 27, 2020 	In Progress

⁶ The Participants submitted to the Commission a request for temporary exemptive relief to extend the implementation time for certain aspects of this Financial Accountability Milestone. See Request for Exemption from Certain Provisions of the National Market System Plan Governing the Consolidated Audit Trail Related to the Online Targeted Query Tool (Dec. 1, 2020), <https://www.catnmsplan.com/sites/default/files/2020-12/12.01.20-CAT-Exemption-Request-OTQT.pdf>

	Implementation Plan Completion Date	Targeted Completion Date or Actual Completion Date	Milestones	Description of Any Variance From the IP	Other Factual Indicators	Description of Status as of 9/30/2020
			(b) the query tool functionality required by Section 6.10(c)(i)(A) and Appendix D, Sections 8.1.1-8.1.3 and Section 8.2.1 incorporates the Industry Member equities transaction data described in condition (a) and is available to the Participants and to the Commission			
3	12/31/2021	12/31/2021	<p>FAM Period 3</p> <p>Completion of Full Availability and Regulatory Utilization of Transactional Database Functionality, defined under CAT NMS Plan Section 1.1 as the point at which:</p> <p>(a) reporting to the Order Audit Trail System (“OATS”) is no longer required for new orders;</p> <p>(b) Industry Member reporting for equities transactions and simple electronic options transactions, excluding Customer Account Information, Customer-ID, and Customer Identifying Information, with sufficient intra-firm linkage, inter-firm linkage, national securities exchange linkage, trade reporting facilities linkage, and representative order linkages (including any equities allocation information provided in an Allocation Report) to permit the Participants and the Commission to analyze the full lifecycle of an order across the national market system, from order origination through order execution or order cancellation, is developed, tested, and implemented at a 5% Error Rate or less;</p> <p>(c) Industry Member reporting for manual options transactions and complex options transactions, excluding Customer Account Information, Customer-ID, and Customer Identifying Information, with all required linkages to permit the Participants and the Commission to analyze the full lifecycle of an order across the national market system, from order origination through order execution or order cancellation, including any</p>	N/A	<p>On track to be met</p> <ul style="list-style-type: none"> • Production Go-Live for Options 2b file submission and data integrity validations on July 20, 2020 • Production Go-Live for Options 2b Intrafirm Linkage validations (Large Industry Members) on August 24, 2020 	In Progress

	Implementation Plan Completion Date	Targeted Completion Date or Actual Completion Date	Milestones	Description of Any Variance From the IP	Other Factual Indicators	Description of Status as of 9/30/2020
			<p>options allocation information provided in an Allocation Report, is developed, tested, and fully implemented;</p> <p>(d) the query tool functionality required by Section 6.10(c)(i)(A) and Appendix D, Sections 8.1.1-8.1.3, Section 8.2.1, and Section 8.5 incorporates the data described in conditions (b)-(c) and is available to the Participants and to the Commission; and</p> <p>(e) the requirements of Section 6.10(a) are met.</p>			
4	12/30/2022	12/30/2022	<p>FAM Period 4</p> <p>Completion of Full Implementation of CAT NMS Plan Requirements, defined under CAT NMS Plan Section 1.1 as the point at which the Participants have satisfied all of their obligations to build and implement the CAT, such that all CAT system functionality required by Rule 613 and the CAT NMS Plan has been developed, successfully tested, and fully implemented at the initial Error Rates specified by Section 6.5(d)(i) or less, including functionality that efficiently permits the Participants and the Commission to access all CAT Data required to be stored in the Central Repository pursuant to Section 6.5(a), including Customer Account Information, Customer-ID, Customer Identifying Information, and Allocation Reports, and to analyze the full lifecycle of an order across the national market system, from order origination through order execution or order cancellation, including any related allocation information provided in an Allocation Report.</p>	N/A	<p>On track to be met</p> <ul style="list-style-type: none"> See completion of FAM 1 and factual indicators for FAM 2 and FAM 3 for progress to completion of FAM 4 	In Progress