# **Industry Checkpoint Call**

March 2, 2021

## Agenda

- Production Statistics
- Phase 2c Test Statistics
- Open Issues
- General Announcements and Reminders
- Upcoming Key Dates
- Q&A

### **Production Statistics**

### Equities - Rolling Five Day Period Initial T+1 vs. T+5 8 am Data Ready for Regulators February 10, 2021 - February 24, 2021

| Trade Date | Late%   | Rejection<br>Initial | Rejection<br>Adjusted | Intrafirm<br>Initial | Intrafirm<br>Adjusted | Interfirm<br>Sent Initial | Interfirm<br>Sent<br>Adjusted | Interfirm<br>Received<br>Initial | Interfirm<br>Received<br>Adjusted | Exchange<br>Initial | Exchange<br>Adjusted | TRF Initial | TRF<br>Adjusted | Overall Error<br>Rate Initial | Overall Error<br>Rate<br>Adjusted |
|------------|---------|----------------------|-----------------------|----------------------|-----------------------|---------------------------|-------------------------------|----------------------------------|-----------------------------------|---------------------|----------------------|-------------|-----------------|-------------------------------|-----------------------------------|
| 2/10/2021  | .0123%  | .0003%               | .0001%                | .0030%               | .0024%                | .0271%                    | .0133%                        | .0840%                           | .0557%                            | .1024%              | .0938%               | .3182%      | .2582%          | .0474%                        | .0397%                            |
| 2/11/2021  | .0012%  | .0008%               | .0003%                | .0028%               | .0022%                | .0196%                    | .0170%                        | .0182%                           | .0169%                            | .0974%              | .0851%               | .2724%      | .2439%          | .0261%                        | .0225%                            |
| 2/12/2021  | .0097%  | .0003%               | .0001%                | .0090%               | .0086%                | .0177%                    | .0147%                        | .0169%                           | .0151%                            | .0846%              | .0185%               | .2687%      | .2472%          | .0355%                        | .0228%                            |
| 2/16/2021  | .0248%  | .0005%               | .0001%                | .0032%               | .0022%                | .0278%                    | .0140%                        | .0321%                           | .0151%                            | .0973%              | .0184%               | .2542%      | .2308%          | .0524%                        | .0337%                            |
| 2/17/2021  | .2195%  | .0006%               | .0004%                | .0099%               | .0019%                | .0195%                    | .0128%                        | .6015%                           | .2692%                            | .1071%              | .0968%               | .3349%      | .2753%          | .3273%                        | .2755%                            |
| 2/18/2021  | .0229%  | .0004%               | .0001%                | .0030%               | .0023%                | .0150%                    | .0133%                        | .0720%                           | .0602%                            | .0261%              | .0174%               | 2.2368%     | 1.6997%         | .0445%                        | .0396%                            |
| 2/19/2021  | .1517%  | .0004%               | .0003%                | .0545%               | .0018%                | .0930%                    | .0139%                        | .0274%                           | .0127%                            | .0265%              | .0256%               | .2942%      | .2764%          | .2072%                        | .1614%                            |
| 2/22/2021  | 1.4638% | .0023%               | .0002%                | .1164%               | .0044%                | .3239%                    | .0160%                        | 1.8390%                          | .0129%                            | .0251%              | .0191%               | .2345%      | .2174%          | 1.8174%                       | 1.4641%                           |
| 2/23/2021  | 2.8269% | .0156%               | .0002%                | .0112%               | .0027%                | 3.4286%                   | .0215%                        | 1.8974%                          | .0727%                            | .0266%              | .0158%               | .1993%      | .1825%          | 3.5313%                       | 2.8245%                           |
| 2/24/2021  | 2.5467% | .0005%               | .0003%                | .0025%               | .0020%                | 3.0857%                   | .0185%                        | 1.7075%                          | .0465%                            | .0255%              | .0120%               | .2372%      | .1959%          | 3.1675%                       | 2.5394%                           |

### Options - Rolling Five Day Period Initial T+1 vs. T+5 8 am Data Ready for Regulators February 10, 2021 - February 24, 2021

| Trade Date | Late%  | Rejection<br>Initial | Rejection<br>Adjusted | Intrafirm<br>Initial | Intrafirm<br>Adjusted | Interfirm Sent<br>Initial | Interfirm Sent<br>Adjusted | Interfirm<br>Received<br>Initial | Interfirm<br>Received<br>Adjusted | Exchange<br>Initial | Exchange<br>Adjusted | Overall<br>Error Rate<br>Initial | Overall<br>Error Rate<br>Adjusted |
|------------|--------|----------------------|-----------------------|----------------------|-----------------------|---------------------------|----------------------------|----------------------------------|-----------------------------------|---------------------|----------------------|----------------------------------|-----------------------------------|
| 2/10/2021  | .0657% | .0224%               | .0210%                | .1378%               | .1375%                | .1618%                    | .0698%                     | .1377%                           | .1298%                            | .1395%              | .1085%               | .2031%                           | .1899%                            |
| 2/11/2021  | .0003% | .0193%               | .0179%                | .1037%               | .1036%                | .0274%                    | .0220%                     | .2265%                           | .2115%                            | .1541%              | .1026%               | .1198%                           | .1011%                            |
| 2/12/2021  | .0000% | .0225%               | .0209%                | .1333%               | .1332%                | .0325%                    | .0267%                     | .1190%                           | .1099%                            | .1877%              | .1312%               | .1448%                           | .1245%                            |
| 2/16/2021  | .4680% | .0270%               | .0253%                | .1588%               | .1588%                | .7290%                    | .0674%                     | 10.2232%                         | .0657%                            | .2211%              | .1622%               | .7909%                           | .6151%                            |
| 2/17/2021  | .3349% | .0321%               | .0315%                | .1594%               | .1594%                | .0207%                    | .0198%                     | 5.4416%                          | .0708%                            | .2092%              | .1583%               | .5727%                           | .4819%                            |
| 2/18/2021  | .0391% | .0315%               | .0218%                | .1628%               | .1628%                | .1444%                    | .1098%                     | .9395%                           | .1822%                            | .1788%              | .1448%               | .2091%                           | .1778%                            |
| 2/19/2021  | .0126% | .0207%               | .0204%                | .1640%               | .1606%                | .1249%                    | .0654%                     | .2067%                           | .0707%                            | .1714%              | .1605%               | .1678%                           | .1591%                            |
| 2/22/2021  | .2343% | .0261%               | .0242%                | .1366%               | .1323%                | .0519%                    | .0490%                     | 9.0089%                          | .0633%                            | .1469%              | .1238%               | .4453%                           | .3088%                            |
| 2/23/2021  | .9021% | .0379%               | .0368%                | .1454%               | .1453%                | 11.8436%                  | .0258%                     | 8.8609%                          | .1000%                            | .2055%              | .1943%               | 1.2938%                          | 1.0466%                           |
| 2/24/2021  | .6854% | .0027%               | .0015%                | .0922%               | .0922%                | 10.3621%                  | .0089%                     | 4.7499%                          | .0687%                            | .1805%              | .1545%               | .9758%                           | .7808%                            |

# **Environment Support**

### 2a/b in Production Mirror As of 1/25/2021

- Schema version 2.2.1
- Machine-to-Machine
   Validations & Feedback

#### **CAT Reporter Portal**

- Reporting Feedback
- Error Corrections
- Report to CAT
- Reporting Relationships
- ATS Order Types

### 2a/b in Production Ongoing

- Schema version 2.2.1
- Machine-to-Machine Validations & Feedback

#### **CAT Reporter Portal**

- Reporting Feedback
- Error Corrections
- Report to CAT
- Reporting Relationships
- ATS Order Types
- Report Card

### 2c in Industry Test As of 1/25/2021

- Schema version 3.1.0
- Machine-to-Machine Validations & Feedback

#### **CAT Reporter Portal**

- Reporting Feedback
- Error Corrections
- Report to CAT
- Reporting Relationships
- ATS Order Types

### 2c in Production As of 4/26/2021

- Schema version 3.1.0
- Machine-to-Machine Validations & Feedback

#### **CAT Reporter Portal**

- Reporting Feedback
- Error Corrections
- Report to CAT
- Reporting Relationships
- ATS Order Types
- Report Card

Phase 2c Compliance Date – 4/26/2021

### **Phase 2c Test Statistics & Observations**

# 2c Statistics & Observations February 16, 2021–February 26, 2021

| Item                                   | Statistic   |
|--|---|
| Total Unique Firms in Industry Test    | 387   |
| Representative Order Linkage Rate      | 99.83%  |
| Fulfillment Order Linkage Rate         | 70.88%  |
| Allocation Events Rejection Rate       | 30.90%  |
| Top Allocation Events Rejection Errors | Missing or Invalid <i>price</i> Missing or Invalid <i>cancelTimestamps</i> Missing or Invalid <i>allocationKeyDate</i> Missing or Invalid <i>DVPCustodianID</i> |

Open Issues (2a/2b)

# FINRA CAT File Submission and Data Integrity (2a/2b) Open Issues List - As of 3/2/2021

| # | Status | Error<br>Code | Summary  | Resolution   | Priority | Test Environment<br>Targeted Release<br>Date/Workaround | Production Environment<br>Targeted Release<br>Date/Workaround | Area                                  |
|---|--------|---------------|--|--------------|----------|---|---|---------------------------------------|
| 1 | Open   | N/A           | Successful file delete submissions are incorrectly getting counted in the rejected files count in the statistics. Does not impact Compliance Error Rate.   | Code Release | Low      | 2Q 2021   | 2Q 2021   | Statistics                            |
| 2 | Open   | N/A           | FINRA CAT is incorrectly accepting invalid name/value in timeInForce of GTD/DAY  | Code Release | Medium   | 2c only: 1/25/2021                                      | 2c only: 4/26/2021  | Ingestion<br>Feedback &<br>Statistics |
| 3 | Open   | N/A           | FINRA CAT did not recognize the early close and improperly marked as late, events that occurred between 1:15 and 4:15 pm ET and were reported by 8 am ET on the next CAT Trading Day. Impact is limited to two days - 11/27/2020 & 12/24/2020. | Code Release | Low      | 2021  | 2021  | Statistics                            |
| Д | Open   | N/A           | The below values are not yet implemented:  | Code Release | Medium   | 2a/2b: 1/25/2021  | 2a/2b: 2/14/2021  | Ingestion                             |
|   | Open   | IV/ C         | <ul> <li>handlingInstructions values 'TTF', 'TTO', and 'TTS'.</li> </ul>   | Code Release | Medium   | 2c: 1/25/2021   | 2c: 4/26/2021   | mgestion                              |

# FINRA CAT Linkage (2a/2b) Open Issues List - As of 3/2/2021

| # | Status | Error<br>Code                | Summary   | Resolution   | Priority | Test Environment<br>Targeted Release<br>Date/Workaround | Production Environment<br>Targeted Release<br>Date/Workaround | Area   |
|---|--------|------------------------------|---|--------------|----------|---|---|--|
| 1 | Open   | N/A                          | Parent not found and Named errors that are reconciled continue to be displayed as 'U' (Unrepaired) in Error Summary & Error Search screens. Feedback & Reporting Summary statistics are not impacted by this issue.   | Code Release | High     | Update: Currently evaluating alternative approach       | Update: Currently evaluating alternative approach             | Error Summary &<br>Error Search<br>Reporter Portal |
| 2 | Open   | 3601                         | Out of Sequence Errors that are caused by an incorrect Time Stamp on the parent event are not being properly reconciled when the parent Time Stamp is corrected. Repaired counts and Adjusted Unlinked Rate are impacted by this issue.   | Code Release | High     | Update: 2021  | Update: 2021  | Intrafirm<br>Statistics                            |
| 3 | Open   | Multiple                     | Parent not found errors are being generated for open option orders when the option symbol changes due to corporate action.  | Code Release | Medium   | 1Q 2021   | 1Q 2021   | Intrafirm<br>Linker Feedback &<br>Statistics       |
| 4 | Open   | 9004<br>8004<br>7004<br>5004 | FINRA CAT did not recognize the early close and improperly marked as unlinked, certain events that occurred between 1:15 and 4:15 pm ET and were reported by 8 am ET on the next CAT Trading Day. Any events that were marked as unlinked were automatically reconciled the following day. Impact is limited to two days - 11/27/2020 & 12/24/2020. | Code Release | Low      | 2021  | 2021  | Interfirm<br>Exchange<br>Trade<br>Linker Feedback  |

# FINRA CAT Linkage (2a/2b) Open Issues List – As of 3/2/2021

| 1 | ŧ | Status       | Error<br>Code                | Summary   | Resolution   | Priority | Test Environment<br>Targeted Release<br>Date/Workaround | Production Environment<br>Targeted Release<br>Date/Workaround | Area                         |
|---|---|--------------|------------------------------|---|--------------|----------|---|---|------------------------------|
|   | 5 | Open         | Multiple                     | FINRA CAT is improperly suppressing <u>interfirm</u> unlinked errors for the equity leg of complex orders. The unlinked error should only be suppressed for the equity leg of complex orders routed to or from an options exchange.   | Code Release | Medium   | 4/26/2021   | 4/26/2021   | Interfirm<br>Linker Feedback |
|   | 6 | Open         | 396                          | FINRA CAT is incorrectly generating warning errors on secondary events in instances where the parent DAY order was subsequently modified to a GTC order.  | Code Release | Medium   | To be scheduled   | To be scheduled   | Intrafirm<br>Linker Feedback |
|   | 7 | Open         | 8003<br>8004<br>9003<br>9004 | FINRA CAT is incorrectly generating an unlinked error for the first time on T+4 for previously linked events in scenarios when the two events that were initially linked occurred on two separate trade dates. For example, an order routed at 6 pm on one calendar day and is reported as accepted by the receiving firm at 8 am on the next calendar day. | Code Release | Medium   | To be scheduled   | To be scheduled   | Interfirm<br>Linker Feedback |
|   | 8 | NEW-<br>Open | 8003<br>8004<br>9003<br>9004 | FINRA CAT incorrectly generated route link key duplicate errors on 02/11, 02/16 and 02/23. As a result, 44 Industry Members received a limited number of incorrect interfirm linkage errors.  | Code Release | Medium   | Not Applicable  | To be scheduled   | Interfirm<br>Linker Feedback |

## FINRA CAT Recently Closed Issues List (2a/2b)

| # | <b>#</b> | Status | Error<br>Code                | Summary   | Resolution   | Priority | Test Environment<br>Targeted Release<br>Date/Workaround | Production Environment<br>Targeted Release<br>Date/Workaround | Area   |
|---|----------|--------|------------------------------|---|--------------|----------|---|---|--|
| ٠ | 1        | Closed | N/A                          | On Processing Date 2/8/21, FINRA CAT generated duplicate interfirm linkage feedback in the production environment. As a result, outstanding interfirm linkage errors for 2/3/21 through 2/5/21 were double counted on 2/8/21 and displayed in linkage statistics and outstanding error files for those trade dates. The issue is expected to be corrected by 2/16/21. | Code Release | High     | Not Applicable  | 2/16/2021   | Interfirm<br>Linker Feedback &<br>Statistics |
| 2 | 2        | Closed | 8003<br>8004<br>9003<br>9004 | FINRA CAT is incorrectly generating interfirm unlinked errors for OTC equity securities when both sides report but the destinationType/ senderType don't match. For example, destinationType= O and senderType= F.  | Code Release | Medium   | 2/8/2021  | 2/8/2021  | Interfirm<br>Linker Feedback                 |

### FINRA CAT Open Issues List (2a/2b)-Planned Enhancements

| # | Status | Error<br>Code | Summary  | Resolution   | Priority | Test Environment<br>Targeted Release<br>Date | Production Environment<br>Targeted Release<br>Date | Area                     |
|---|--------|---------------|--|--------------|----------|--|--|--------------------------|
| 1 | Open   | 2133          | For Name/Value Pair Data type fields, providing a value that is not in allowable values list returns error code 2133 (Additional Field) instead of error code 2101 (Missing or Invalid timeInForce).         | Code Release | Low      | 2c only: March 2021                          | 2c only: 4/26/2021                                 | Ingestion<br>Validations |
| 2 | Open   | 2122          | Incorrect error code is generated when an array field (e.g., clientDetails) is provided as a Name/Value pair.  | Code Release | Low      | To be scheduled                              | To be scheduled                                    | Ingestion<br>Validations |
| 3 | Open   | 2027          | Incorrect error code is being generated when eventTimestamp is a future date (2027-eventTimestamp must be in the correct format instead of 2139 - eventTimestamp is greater than the current date and time). | Code Release | Low      | To be scheduled                              | To be scheduled                                    | Ingestion<br>Validations |

## Open Issues (2c)

# FINRA CAT Linkage (2c) Open Issues List – As of 3/2/2021

| # | Status       | Error<br>Code | Summary   | Resolution   | Priority | Test Environment<br>Targeted Release<br>Date | Production Environment<br>Targeted Release<br>Date | Area             |
|---|--------------|---------------|---|--------------|----------|--|--|------------------|
| 1 | NEW<br>-Open | 3501          | FINRA CAT is incorrectly generating an unlinked error on T+4 on MEAA events when the parent MEPA is reported on a prior date. | Code Release | Medium   | 3/15/2021                                    | Not Applicable                                     | Linkage Feedback |

## FINRA CAT Recently Closed Issues List (2c)

| # | Status | Error<br>Code | Summary   | Resolution   | Priority | Test Environment<br>Targeted Release<br>Date | Production Environment<br>Targeted Release<br>Date | Area                     |
|---|--------|---------------|---|--------------|----------|--|--|--------------------------|
| 1 | Closed | 2081          | FINRA CAT is incorrectly rejecting a Quote Received event (MEQR) when receivedQuoteID is not populated.   | Code Release | Medium   | 2/21/2021                                    | Not Applicable                                     | Ingestion<br>Validations |
| 2 | Closed | 2176          | FINRA CAT is incorrectly accepting future dates in the tradeDate field in Allocation Events (MEPA, MEAA).   | Code Release | Medium   | 2/21/2021                                    | Not Applicable                                     | Ingestion<br>Validations |
| 3 | Closed | 2146          | FINRA CAT is incorrectly rejecting an Order Fulfillment Amendment Event (MEFA) when clientDetails is not populated.   | Code Release | Medium   | 2/21/2021                                    | Not Applicable                                     | Ingestion<br>Validations |
| 4 | Closed | N/A           | Portal Error Correction is accepting values that have been removed from the 2c spec. Such records are subsequently rejected with Ingestion Feedback.  | Code Release | High     | 2/21/2021                                    | Not Applicable                                     | Portal Correction        |
| 5 | Closed | 2145          | FINRA CAT is incorrectly rejecting fulfillment events when fulfillmentLinkType is 'YE' and firmDetails are populated.   | Code Release | High     | 2/21/2021                                    | Not Applicable                                     | Ingestion<br>Validations |
| 6 | Closed | 2179          | FINRA CAT is not rejecting allocation events when allocationType is 'DVPF' and DVPCustodianID is not populated.  Note that beginning February 21, 2021, new allowable values 'FDVP' and 'FDVF' will be available for use in test, and conditional check will be enhanced to include these values. | Code Release | High     | 2/21/2021                                    | Not Applicable                                     | Ingestion<br>Validations |

# Planned Industry Member Technical Specification Updates – Last Updated 3/2/2021 – Phase 2c

| # | Status | Summary   | Release Date | Spec Version |
|---|--------|---|--------------|--------------|
| 1 | Open   | Clarify that DVPCustodianID is required for allocationType values DVP, DVPF, FVDP, and FDVF | 3/5/2021     | 3.1.0 r11    |

### **General Announcements and Reminders**

## Announcements

- Upcoming Industry Webinars:
  - Requests for Quotes (RFQs) and Other Forms of Solicitation (March 4, 2021)
  - CAT Connectivity (March 9, 2021)
  - Phase 2d CAT Reporting Requirements for OTC Link ATS Subscribers (March 10, 2021)
  - Monthly CAT Implementation Update and FINRA (SRO) Status Update on OATS Retirement (March 18, 2021)
  - Phase 2d OTC Link ATS Scenarios Deep Dive (March 24, 2021)

## Reminders

- > The presentation and recording from the following Industry Webinars are available on the CAT website:
  - Industry Member Report Card 101 Webinar (February 24, 2021)
  - Monthly CAT Implementation Update (February 18, 2021)
- Industry Checkpoint Calls are held bi-weekly
  - The next Industry Checkpoint Call is scheduled for March 16, 2021

# **Upcoming Key Dates**

## Upcoming Key Dates for Phases 2c and 2d

| Topic                                      | Event  | Date                                 |
|--|--|--------------------------------------|
| Industry Call: Industry Testing Checkpoint | Industry Testing Checkpoint Calls – Bi-weekly, on Tuesdays at 4:15 pm (ET) | January 7, 2020 until further notice |
| Compliance Go-Live                         | Production Go-Live for Equities 2c reporting requirements                  | April 26, 2021                       |
| Release Availability                       | Test Environment Opens for Phase 2d reporting requirements                 | June 28, 2021                        |
| Compliance Go-Live                         | Production Go-Live for Phase 2d reporting requirements                     | December 13, 2021                    |

## How to Ask a Question during Today's Call

### For participants using computer audio:

- Click the "Raise Hand" button at the bottom of the participant's window.
- A visual prompt will indicate that your line has been unmuted.

### For participants using phone audio:

- Enter \*9 on your phone keypad.
- An audio prompt will indicate that your line has been unmuted.

## FINRA CAT Helpdesk

Questions may be directed to the FINRA CAT Helpdesk at 888-696-3348 or help@finracat.com