Consolidated Audit Trail

Customer and Account Information System (CAIS)

CAIS Technical Specification – 2021-05-07 Revision

5/18/21

Specification Updates

- Key Updates
  - Addition of correspondentCRD
  - Enabled reporting multiple versions of a customer in a single file
  - Removal of Material and Minor Inconsistencies for Natural Person CAT Customer Name fields
  - Customer Type moved from FDID to CAT Customer
  - Changes to FDID identifier fields
  - Character rules updates for firmDesignatedID
- Minor Updates
  - Removed LTID date validations against FDID dates (originally in LTID Specification)
  - Clarified Feedback File creation and versioning approach (originally in LTID Specification)
  - Updated data and feedback examples based on schema changes
  - Modifications to Appendix B: Error Codes

Correspondent CRD

➢ New attribute, correspondentCRD, added to the Main JSON Object level – same as Submitter ID and CAT Reporter CRD – within the CAIS Data File.

➢ Enables an Industry Member to report customer and account data within the file as being that of correspondent Introducing Brokers.

➢ All customer and account records present within the file will be treated as for this Correspondent; Firm Designated ID is still required to be unique to the CAT Reporter CRD and is not able to be reported for multiple Correspondents.

➢ CAIS will not validate a business relationship exists between the CAT Reporter CRD and noted Correspondent CRD.

Example:

"catReporterCRD": 12345678,

"submitterID": 12345678,

"correspondentCRD": 99999999

Multiple Customer Versions

➤ CAIS validations are being relaxed to allow for multiple versions of the same CAT Customer – as noted by the same TID data – to be present within a single submission file. These separate versions must be reported with different Customer Record ID pointers.

  ➤ Material Inconsistency against the First Name and Last Name values for a Natural Person CAT Customer has been removed.

  ➤ Minor Inconsistency against the Last Name value for a Natural Person CAT Customer has been removed.

➤ All versions of the same CAT Customer present in the file must have certain data consistent across the versions, including:

  ➤ Year of Birth for Natural Person CAT Customers

  ➤ EIN for Legal Entity CAT Customers

  ➤ Reporting of a Foreign TID Type record only as one of Natural Person or Legal Entity customer types

  ➤ Customer Start Date, End Date, and End Reason

➤ CAIS will create a consolidated version of the CAT Customer from the values in the file, including the multiple Names, Addresses, Customer Types, and LEI codes.

JSON Examples

➤ The following is a subset of fields for an example of multiple versions of a CAT Customer within a single submission file.

Data File
Customer Records
```
"naturalPersonCustomerList":[
 {"customerRecordID": 1,
  "firstName": "John",
  "lastName": "Doe",
  "yearOfBirth": "1980"
 },
 {"customerRecordID": 25,
  "firstName": "Joseph",
  "lastName": "Doe",
  "yearOfBirth": "1980"
 },
 {"customerRecordID": 70,
  "firstName": "Jay",
  "lastName": "Doe",
  "yearOfBirth": "1980",
  "addressList": [
   {"addrType": "ADDRESS1",
    "addrLine1": "123 MAIN ST",
    "city": "NEW YORK",
    "regionCd": "US-NY",
    "countryCd": "US"
   }
  ]
 } ]
```

TIDS File
Transformed Identifiers Records
```
"tidRecordList":[
 {"customerRecordID": 1,
  "tidType": "SSN/ITIN",
  "tidValue":
"1438887c12c566c8f87325380e06517bfb2e46e4de7e07fc6f004ea5bb21945d"  },
 {"customerRecordID": 25,
  "tidType": "SSN/ITIN",
  "tidValue":
"1438887c12c566c8f87325380e06517bfb2e46e4de7e07fc6f004ea5bb21945d"  },
 {"customerRecordID": 70,
  "tidType": "SSN/ITIN",
  "tidValue":
"1438887c12c566c8f87325380e06517bfb2e46e4de7e07fc6f004ea5bb21945d"  }
 ]
```

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Customer Type

➤ Customer Type attribute moved from the FDID Record to the CAT Customer Record level – both Natural Person and Legal Entity records.

➤ Allows Industry Members to clearly denote the Customer Type as applicable to the specific CAT Customer, rather than all values from all CAT Customers associated to the account.

➤ Same values and definitions applicable, with the following exceptions:
  ➤ Removed the value of OTHER
  ➤ Added the value of NOTAPPLICABLE - None of the defined terms are applicable to the customer

FDID Identifier Field Updates

➢ Three FDID record level fields changed from Alphanumeric to Arrays, to enable Industry Members to report multiple values for the field on a single account:

   ➢ primeBrokerID
   ➢ bankDepositoryID
   ➢ clearingBrokerID

➢ Descriptions and validations for primeBrokerID and bankDepositoryID updated to require one or the other fields to be populated only when the Account Type attribute includes the value of "DVP/RVP" – not required if Account Type does not include this value.

Special Rules for FDID Characters

➢ The firmDesignatedID data type was previously updated from Alphanumeric to Text, allowing for use of additional characters in the attribute. These additional characters require additional rules for the firmDesignatedID field, as noted in the Specification:

  ➢ An FDID reported as the value "PENDING", regardless of case, will be rejected

  ➢ Inclusion of any of the following character combinations in an FDID will result in rejection of the FDID due to JSON data parsing rules unless the backslash is properly escaped:

   \b   \r   \f   \n   \t   \"

  ➢ A backslash that is followed by any character other than the ones noted above, will result in the file having an Integrity Error for invalid JSON, unless the backslash is properly escaped. As an example of a properly escaped backslash, if a firm has an FDID of "1234\ABCD", they would be required to report this to CAIS as "1234\\ABCD".

  ➢ Backslash escaping guidance also provided by CAT Transaction reporting using JSON files.

  ➢ For **Manual Submissions** using the CAIS Reporter Portal, the system will properly escape the backslash for you – it is not necessary to escape the backslash within the UI.

  ➢ Leading and trailing spaces in an FDID will be removed during processing, and the string between them will be stored in CAIS. Spaces bounded by other characters within the FDID string will be retained.

  ➢ An FDID that consists of only spaces will be rejected.

FINRA CAT Helpdesk

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

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- **For participants using computer audio:**
  - Click the "Raise Hand" button at the bottom of the participants window.
  - A visual prompt will indicate that your line has been unmuted.

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