Industry CAT CAIS Release Status

June 29th, 2022

Proposed Industry Member Timeline - Summary

Step	Requirement	Date
1	Production Certification	July 25, 2022
2	FINRA CAT Begins Scheduling At Least Partial Submissions to Production by CAT Submitters	August 1, 2022
3	Scheduled Submissions To Production	August 15 – September 15, 2022
4	FINRA CAT Begins Scheduling Initial Full Account List Submissions to Production by all Firms	October 3, 2022
5	Scheduled Reporting of All Active Accounts* and Customers as of September 30 established in Production	October 10 – October 31, 2022
6	Daily reporting required (delta or full files)	November 7, 2022
7	All Rejections and Material Inconsistences addressed	December 5, 2022
8	Full CAIS Compliance date (Error correction timeline fully enforced)	December 12, 2022

* Active Accounts are those accounts with CAT reportable activity on or after June 12, 2022

Denotes Plan Processor date

Agenda

- Full CAIS Release Update
- Open Issues
- Planned Enhancements
- Specification Updates
- Certification Reminders
- General Announcements & Reminders
- Q&A

Industry CAT Full CAIS Release Update

Industry Member Release Rollout -Pre-Production

Full CAIS Release 1

Industry Test – 1/31/2022 Production – 4/25/2022

Ingestion

- Industry Test Open for Machine-to-Machine File & Data Integrity Validations, Material Inconsistencies, and Feedback
- Feedback file contains up to 1,000 Rejections

CAIS Reporter Portal

- Manual File Upload
- Manual Submission
- Submission Feedback
- Inconsistencies Feedback
- Nightly Inconsistencies Report

Full CAIS Certification opened on 2/1/2022

Full CAIS Release 2a Industry Test – 3/28/2022 Production – 4/25/2022

Ingestion

- New DRIVERLICENSE Foreign TID Type
- EIN Validation changed to format validation
- Feedback file enhanced to include all Rejections feedback

CAIS Reporter Portal

 FDID Reconciliation Report updated with Full CAIS information (count of CAT Customers and Version information) Full CAIS Release 2b Industry Test – 4/11/2022 Production – 4/25/2022

Ingestion

- Remove OTHBKR and CP customerType values for Legal Entity Customer Records
- Remove BROKERAGE and ADVISED values for accountType
- Remove primeBrokerID and bankDepositoryID fields and add a new DVPCustodianID field

Industry Member Release Rollout -Production

Full CAIS Release 3a

Industry Test – 5/25/2022 Production – 6/13/2022

Ingestion

- New Authorized Trader Names List on FDID record
- Increase *lastName* field length to 200 characters

Reports

 FDID Version Report posted to SFTP weekly, containing active LTID Phase FDIDs not updated to Full CAIS Phase

CAIS Reporter Portal

 FDID Version Report available on-demand, containing active LTID Phase FDIDs not updated to Full CAIS Phase

Full CAIS Release 4 Industry Test – 6/26/2022 Production – 7/1/2022

Ingestion

 New OTHGOVT Foreign TID Type

Performance Enhancements

 CAIS file processing improvements

Minor Enhancements and Bug Fixes

Full CAIS Release 5

Industry Test – TBD

Production – TBD

Ingestion

- New INACTIVE FDID End Reason
- Automated Transfer Procedure

Performance Enhancements

 CAIS file processing improvements

	Industry Test Environment											
	Monday, 6/20 Tuesday, 6/21		Wednesday, 6/22	Thursday, 6/23	Friday, 6/24	Saturday, 6/25	Sunday, 6/26					
Number of Total Submitters	9	24	30	25	24	8	1					
Number of Unique Firms	10	41	185	99	149	107	1					
Number of Files Received	Total: 13 Reporter Portal: 5 SFTP: 8	Total: 218 Reporter Portal: 78 SFTP: 140	Total: 848 Reporter Portal: 57 SFTP: 791	Total: 222 Reporter Portal: 75 SFTP: 147	Total: 325 Reporter Portal: 26 SFTP: 299	Total: 327 Reporter Portal: 0 SFTP: 327	Total: 15 Reporter Portal: 14 SFTP: 1					
Number of Files Rejected	6	20	25	30	17	75	0					
File Reject Rate	46.15%	9.17%	2.95%	13.51%	5.23%	22.94%	0.00%					

	Industry Test Environment												
	Monday, 6/20	Tuesday, 6/21	Wednesday, 6/22	Thursday, 6/23	Friday, 6/24	Saturday, 6/25	Sunday, 6/26						
FDID Records Accepted	1,918	210,347	470,961	20,723	392,544	180,536	15						
FDID Records Rejected	8,059	661,650	125,409	14,118	17,689	38,019	0						
FDID Records Submitted	9,977	871,997	596,370	34,841	410,233	218,555	15						
FDID Record Rejection Rate	80.78%	75.88%	21.03%	40.52%	4.31%	17.40%	0.00%						

Industry Test Environment												
	Monday, 6/20	Tuesday, 6/21	Wednesday, 6/22	Thursday, 6/23	Friday, 6/24	Saturday, 6/25	Sunday, 6/26					
Customer Records Accepted	14,252	341,460	418,431	20,234	239,713	104,240	1					
Customer Records Rejected	14,637	74,113	25,502	16,182	27,568	66,406	0					
Customer Records Submitted	28,889	415,573	443,933	36,416	267,281	170,646	1					
Customer Record Rejection Rate	50.67%	17.83%	5.74%	44.44%	10.31%	38.91%	0.00%					

	Production Environment											
	Monday, 6/20 Tuesday, 6/21		Wednesday, 6/22	Wednesday, 6/22 Thursday, 6/23		Saturday, 6/25	Sunday, 6/26					
Number of Total Submitters	0	2	3	3	2	0	0					
Number of Unique Firms	0	2	3	3	2	0	0					
Number of Files Received	Total: 0 Reporter Portal: 0 SFTP: 0	Total: 2 Reporter Portal: 1 SFTP: 1	Total: 13 Reporter Portal: 12 SFTP: 1	Total: 11 Reporter Portal: 10 SFTP: 1	Total: 8 Reporter Portal: 7 SFTP: 1	Total: 0 Reporter Portal: 0 SFTP: 0	Total: 0 Reporter Portal: 0 SFTP: 0					
Number of Files Rejected	0	0	0	0	0	0	0					
File Reject Rate	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					

	Production Environment												
	Monday, 6/20	Monday, 6/20 Tuesday, 6/21 Wednesday, 6/22 Thursday, 6/23 Friday, 6/24 S											
FDID Records Accepted	0	2	13	11	8	0	0						
FDID Records Rejected	0	0	0	0	0	0	0						
FDID Records Submitted	0	2	13	11	8	0	0						
FDID Record Rejection Rate	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%						

	Production Environment												
	Monday, 6/20	Tuesday, 6/21	Wednesday, 6/22	Thursday, 6/23	Friday, 6/24	Saturday, 6/25	Sunday, 6/26						
Customer Records Accepted	0	2	13	11	8	0	0						
Customer Records Rejected	0	0	0	0	0	0	0						
Customer Records Submitted	0	2	13	11	8	0	0						
Customer Record Rejection Rate	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%						

Full CAIS Phase Rejection Observations

Rejection Source	Top Rejection Reasons
File	 Duplicate file Paired file not received or encountered a File Integrity Error CAIS File not Readable Missing or Invalid FDID Record Count, Legal Entity Record Count, or Natural Person Record Count
FDID	 No customer with trading capabilities <i>roleStartDate</i> set prior to <i>fdidDate</i> FDID rejected because Customer was rejected or no customer was associated to the FDID Missing or invalid <i>customerRecordID</i>
Customer	 Customer rejected because FDID was rejected Malformed TID Missing or Invalid format of <i>yearOfBirth</i> Missing or Invalid <i>lastName</i>

Open Issues, Planned Enhancements, and Specification Updates

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production Environment Targeted Release Date/Workaround	Area Affected
1	Open	N/A	Data file submissions intermittently display on the Reporter portal as in progress and completed simultaneously.	Code Release	Low	Fix: Deployed 6/26/2022	Fix: 7/1/2022	Reporter Portal
2	Open	N/A	Some nightly inconsistencies feedback files may be null or may not contain the identified Impacted inconsistencies for the day.	Code Release	High	Fix: Deployed 6/26/2022	Fix: 7/1/2022	Inconsistencies
3	Open	22041	Instances of CAIS Data feedback containing 22041 errors when the <i>customerRecordID</i> is present in the file on either a Natural Person or Legal Entity customer record, and the same <i>customerRecordID</i> has a malformed TID warning in the CAIS TIDS feedback. A 22048 error is expected instead of the 22041 error.	Code Release	Medium	Fix: 7/31/2022	Fix: 8/8/2022	Data Validation
4	Open	N/A	Counts of Customers and FDIDs in submission file do not match the receivedFDIDRecordCount, receivedNaturalRecordCount, or	Code Release	High	Fix: Deployed 6/26/2022	Fix: 7/1/2022	Data Validation

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production Environment Targeted Release Date/Workaround	Area Affected
5	Open	N/A	Submission files transitioned to a COMPLETED_FILE_TIMEOUT state due to one of the intended paired files failing Integrity check, not being submitted in a timely fashion, or failing unexpectedly, display errantly on the In Progress tab within the Reporter Portal UI. Expected behavior is the timed out file moves to the Completed Submissions tab. COMPLETED_FILE_TIMEOUT feedback is available for the submission file on the SFTP site.		Medium	Fix: Deployed 6/26/2022	Fix: 7/1/2022	Reporter Portal
6	Open	N/A	Intermittent instances of CAIS Data files remaining in a FILE_INTEGRITY_PASSED status for an extended time and not completing processing, when the same CAT Customer is reported with multiple customerRecordID values, one for each association to the FDID Record, when reporting via Option 2 in Scenario 3.5.1.		High	Fix: Deployed 6/26/2022	Fix: 7/1/2022	Data Ingestion

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production Environment Targeted Release Date/Workaround	Area Affected
7	Open	N/A	Users from Self-Reporter firms are not able to access the Customer Rejections tab within the Reporter Portal. Attempting to access the page returns an error indicating the user is "Not authorized for requested CRD".	Code Release	High	Workaround: Feedback is available by SFTP for all files, and the Completed Submissions tab for Manual Form Submission or files uploaded via the CAIS Reporter Portal UI. Fix: Deployed 6/13/2022	Fix: 7/1/2022	Reporter Portal
8	Open	N/A	The <i>correspondentCRD</i> attribute is incorrectly named <i>catCorrespondentCRD</i> within the Submission Inconsistencies Feedback File	Code Release	Medium	Fix: Deployed 6/26/2022	Fix: 7/1/2022	Reporter Portal
9	Open	N/A	Instances of files failing to complete processing when a large number of updateNotifications are included in the file.	Code Release	High	Fix: Deployed 6/26/2022	Fix: 7/1/2022	Data Validation
10	Open	N/A	Intermittent instances where not all TIDs feedback file versions are being generated for a submission. Final feedback is provided including all status transitions, however one or more feedback file versions are missing.	Code Release	Medium	Fix: 7/31/2022	Fix: 8/8/2022	Data Validation

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production Environment Targeted Release Date/Workaround	Area Affected
11	Open	N/A	Instances of the Submission Report showing a file as "Processing" when the file has completed processing and processing feedback has been published.	Code Release	High	Fix: 6/29/2022	Fix: N/A	Reporter Portal
12	New – Open	N/A	Counts of customer records received and successful in the CAIS Data Feedback file are reconciled to a count of unique TIDs, rather than the count of <i>customerRecordID</i> values in the file. This also occurs for the count of Customer records Processed, Accepted, and Rejected displayed within the CAIS Reporter Portal on the Completed Submissions and Submission Report.		High	Fix: TBD	Fix: TBD	Feedback and Reporter Portal

CAT Full CAIS Recently Closed Issues List As of 6/29/2022

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CAT CAIS Planned Enhancements – Open

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date	Production Environment Targeted Release Date	Area
1	Open	N/A	The Update button on a Manual Form Submission is enabled when viewing a previously added record. The button should be disabled until at least one field is updated by the user.	Code Release	Low	Fix: TBD	Fix: TBD	Manual Form Submission
2	Open	N/A	When selecting date values in the Manual Form Submission, the date is not selected when the user first clicks a date. The date is only selected on the second click.	Code Release	Low	Fix: TBD	Fix: TBD	Manual Form Submission
3	Open	N/A	Certain columns are not displayed in the Submission Report by default.	Code Release	Low	Workaround: User may add the columns to their view. Fix: TBD	Fix: TBD	Reporter Portal
4	Open	22999	Increase the current 100 Customer Record limit on number of CAT Customers that can be associated with an FDID Record.	Code Release	High	Fix: TBD	Fix: TBD	Data Validation

CAT CAIS Planned Enhancements – Recently Closed

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date	Production Environment Targeted Release Date	Area
1								

CAT CAIS-Planned Full CAIS Phase Specification Updates

#	Status	Summary	Publish Date	Spec Version	Effective Date - Test	Effective Date - Prod
1	Published	Add a new <i>fdidEndReason</i> value of 'INACTIVE' as option to end FDIDs that have had no CAT-reportable activity events (e.g., MENO, MEOR, MEOT, etc.) associated with the Account in the prior six months. For the purposes of periodic refresh requirements, monthly refresh report excludes any FDID with an <i>fdidEndReason</i> of 'INACTIVE' populated and an <i>fdidEndDate</i> set on or before the date of the report.	3/9/2022	2.0r7	TBD	TBD
2	Published	Add an additional <i>foreignTIDType</i> value of an other government assigned identifier ("OTHGOVT") that is known to have been assigned by a non-national level government entity, such as a local government entity. The OTHGOVT <i>foreignTIDType</i> will be added as the last entry in the Foreign TID Type hierarchy, after "DRIVERLICENSE," and will be usable for both Natural Person and Legal Entity CAT Customers.	4/8/2022	2.0r8	6/27/2022	7/1/2022
3	Open	Update the description of Error Code 22523 – Customer Record rejected because an associated FDID was rejected – to include that the Error Code is also returned in the event the Customer Record is not associated to at least one FDID within the submission file.	TBD	2.0r10	N/A	N/A
4	Open	Update the October 11, 2022 date in the description of the role value of 'AUTH3RD' to be consistent with revised FAQ T7. Specifically, Prior to January 16, 2023, this role may be used when the Industry Member itself has authority to place orders for the Account without prior approval of the account holder(s) and is not the holder of the account. Effective January 16, 2023, the role for the Industry Member must be reported as 'AUTHREP'.	TBD	2.0 r10	N/A	N/A
5	Open	Clarify the description of the customerType value of 'RIC'- Customer is a Registered Investment Company, as defined in the Investment Company Act of 1940 (15 U.S.C. § 80a–3(a)(1)), if maintained in the Industry Member's general customer and account records.	TBD	2.0 r10	N/A	N/A
6	Open	Update the definition of the sentinel file for the Nightly Inconsistencies scans to remove the .bz2 compression. The sentinel file does not contain any significant data and does not require the compression.	TBD	2.0r10	N/A	N/A
7	Open	Clarify that a total of 100 Customer Records can currently be associated with an FDID Record. Create additional Error Code for more granularity on this validation, currently feedback provided under Error Code 23999 (Unhandled Exception).	TBD	2.0r10	N/A	N/A

* Planned Technical Specification updates are subject to approval by the CAT NMS Plan Operating Committee.

CAT CAIS-Planned Full CAIS Phase Specification Updates

#	Status	Summary	Publish Date	Spec Version	Effective Date - Test	Effective Date - Prod
8	Open	Update the Table 17 and Table 18 entries for the file status of COMPLETED_FILE_TIMEOUT to include the status is also returned in the CAIS Data Feedback or TIDS Feedback files in the event the paired file is received but reaches a COMPLETED_INTEGRITY_ERROR state.	TBD	2.0r10	N/A	N/A
9	Open	Clarify that the nightly inconsistencies scan feedback for Material Inconsistencies where the Industry Member is Impacted by submissions of another Industry Member is provided to the Impacted Industry Member no later than 8AM ET each processing day.	TBD	2.0 r10	N/A	N/A
10	Open	Remove submissionStatus from Submission Inconsistencies Feedback File.	TBD	2.0 r10	TBD	TBD
11	New – Open	Remove error code 22066 (<i>roleStartDate</i> set prior to <i>fdidDate</i>).	TBD	2.0 r10	TBD	TBD

* Planned Technical Specification updates are subject to approval by the CAT NMS Plan Operating Committee.

General Announcements and Reminders

Full CAIS Phase Reporting Certification

- > Full CAIS Phase Certification is July 25, 2022.
- > There are currently **638** firms certified for Full CAIS reporting.
- > Webinar from October 6, 2021, covered Full CAIS certification requirements and is available on the <u>CAT NMS Plan site</u>.
- Certification is also detailed in the <u>Industry Member CAIS</u> <u>Onboarding Guide</u>.

FINRA CAT Announcements and Reminders

- CAT CAIS Checkpoint Calls are now being held weekly. The next call will be on July 6th.
- Connectivity Guides, Reporting Scenarios, Use Cases, and updated FAQs available at catnmsplan.com

FINRA CAT Helpdesk

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

How to Ask a Question during Today's Call

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.

For participants using phone audio:

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

Appendix A: Industry CAT CAIS LTID Release Update

Production Environment										
	Monday, 6/20	Monday, 6/20 Tuesday, 6/21 Wednesday, 6/22		Thursday, 6/23	Friday, 6/24	Saturday, 6/25	Sunday, 6/26			
Number of Total Submitters	24	49	61	63	59	17	2			
Number of Unique Firms	25	289	514	556	494	300	2			
Number of Files Received	Total: 26 Reporter Portal: 0 SFTP: 26	Total: 573 Portal: 262 SFTP: 311	Total: 1,337 Portal: 297 SFTP: 1,090	Total: 1,157 Reporter Portal: 90 SFTP: 1,067	Total: 936 Reporter Portal: 15 SFTP: 921	Total: 688 Reporter Portal: 0 SFTP: 688	Total: 2 Reporter Portal: 0 SFTP: 2			
Number of Files Rejected	0	18	4	14	2	15	0			
File Reject Rate	0.00%	3.05%	0.29%	1.20%	0.21%	2.13%	0.00%			

Production Environment										
	Monday, 6/20	Tuesday, 6/21	Wednesday, 6/22	Thursday, 6/23	Friday, 6/24	Saturday, 6/25	Sunday, 6/26			
Records Accepted	183,461	3,304,364	1,068,492	1,266,509	963,451	958,511	386			
Records Rejected	7	45	42	37	17	28	0			
Records Submitted	183,468	3,304,409	1,068,534	1,266,546	963,468	958,539	386			
Record Rejection Rate	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production Environment Targeted Release Date/Workaround	Area Affected
1	Open	N/A	Instances of an LTID Phase submission file not completing processing and remaining in a RECORD_SCAN_COMPLETED as a result of an error in the handling of the Submission ID. The feedback file available on the SFTP will contain any identified rejections, however the final transition to the Completed state is not received.	Code Release	High	Fix: Deployed 6/8	Fix: 7/1/2022	Data Validation
2	Open	N/A	Some rejection repairs are not properly reflected in the Submission Report information. This also impacts statistics in the monthly Report Card.	Code Release	High	Fix: Deployed 6/26/2022	Fix: 7/1/2022	Data Validation & Report Cards

CAT CAIS LTID Recently Closed Issues List – As of 6/22/2022

#	Status	Error Code	Issue Summary	Resolution	Priority	Test Environment Release Date	Production Environment Release Date	Area Affected
1								

CAT CAIS-Planned LTID Phase Specification Updates

#	Status	Summary	Publish Date	Spec Version
1	Open	Clarify that malformed LTID can be corrected by sending the same FDID with corrected LTID entry - does NOT require correction Action message	TBD	V1.2.3