Industry CAT CAIS Release Status

July 20th, 2022

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–Full CAIS 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 – Full CAIS 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 – 9/12/2022
Production – 9/26/2022

Performance Enhancements
- CAIS file processing improvements

CAIS Report Card Release

Report Card
- Full CAIS Compliance begins in January Report Card published on February 15th, 2023
- Compliance Rates distinguished for Correspondent data

Industry Member Release Rollout – Planned Future Enhancements

Industry Test – TBD

Production – TBD

- INACTIVE End Reason
- Automated Transfer Procedure
- Optimization of error feedback

Submissions in Full CAIS Phase – Report Cards

➢ While there is currently no compliance obligation for the reporting of Full CAIS Phase FDIDs, all Full CAIS FDID reporting errors have been included in the Compliance Error Rate beginning April 24, 2022 in the CAIS Reporter Daily Statistics and the April 2022 CAIS Report Cards.

➢ **Beginning with the August 2022 Report Card, only LTID Phase (V1) FDID statistics will be included in the CAIS Report Card.**

➢ If an Industry Member transitions to reporting all Full CAIS Phase submissions (V2) prior to the Compliance Go-Live date, it will not receive a Report Card for the months it submitted only Full CAIS Phase data.

Full CAIS Phase – Compliance Error Rates

➤ **Customer Record** reporting errors will be included in the Customer and Overall Submission Error Rate beginning on the Full CAIS Compliance Date of December 12, 2022 and will be included with the January 2023 Report Card, published in February 2023.

➤ **Transaction Report Cards**

FDID validation errors reported to the transaction reporting system will not be included in compliance statistics until after December 12, 2022 and will appear in the Transaction Report Card beginning with the month of January 2023, published in February 2023.

Full CAIS Phase Statistics – July 11ᵗʰ – July 17ᵗʰ, 2022

Industry Test Environment							
	Monday, 7/11	**Tuesday, 7/12**	**Wednesday, 7/13**	**Thursday, 7/14**	**Friday, 7/15**	**Saturday, 7/16**	**Sunday, 7/17**
Number of Total Submitters	26	25	35	42	37	9	7
Number of Unique Firms	38	216	236	244	235	142	7
Number of Files Received	Total: 142 Reporter Portal: 58 SFTP: 84	Total: 1,580 Reporter Portal: 96 SFTP: 1,484	Total: 1,268 Reporter Portal: 89 SFTP: 1,179	Total: 945 Reporter Portal: 85 SFTP: 860	Total: 897 Reporter Portal: 69 SFTP: 828	Total: 665 Reporter Portal: 0 SFTP: 665	Total: 12 Reporter Portal: 9 SFTP: 3
Number of Files Rejected	51	24	253	25	40	4	0
File Reject Rate	35.92%	1.52%	20.00%	2.65%	4.46%	0.60%	0.00%

Full CAIS Phase Statistics – July 11th – July 17th, 2022

Industry Test Environment							
	Monday, 7/11	Tuesday, 7/12	Wednesday, 7/13	Thursday, 7/14	Friday, 7/15	Saturday, 7/16	Sunday, 7/17
FDID Records Accepted	1,370,894	832,368	755,528	699,876	702,691	242,615	25,852
FDID Records Rejected	64,984	51,614	37,469	141,511	23,872	12,163	10,420
FDID Records Submitted	1,435,878	883,982	792,997	841,387	726,563	254,778	36,272
FDID Record Rejection Rate	4.53%	5.84%	4.72%	16.82%	3.29%	4.77%	28.73%

Full CAIS Phase Statistics – July 11th – July 17th, 2022

Industry Test Environment							
	Monday, 7/11	**Tuesday, 7/12**	**Wednesday, 7/13**	**Thursday, 7/14**	**Friday, 7/15**	**Saturday, 7/16**	**Sunday, 7/17**
Customer Records Accepted	1,283,233	803,247	649,269	498,406	501,424	316,686	19,681
Customer Records Rejected	63,823	45,508	42,382	127,843	33,217	16,011	327
Customer Records Submitted	1,347,056	848,755	691,651	626,249	534,641	332,697	20,008
Customer Record Rejection Rate	4.74%	5.36%	6.13%	20.41%	6.21%	4.81%	1.63%

Full CAIS Phase Statistics – July 10th – July 17th, 2022

Production Environment							
	Monday, 7/11	**Tuesday, 7/12**	**Wednesday, 7/13**	**Thursday, 7/14**	**Friday, 7/15**	**Saturday, 7/16**	**Sunday, 7/17**
Number of Total Submitters	5	5	4	2	3	0	0
Number of Unique Firms	5	5	4	2	3	0	0
Number of Files Received	Total: 6 Reporter Portal: 5 SFTP: 1	Total: 35 Reporter Portal: 34 SFTP: 1	Total: 14 Reporter Portal: 13 SFTP: 1	Total: 3 Reporter Portal: 2 SFTP: 1	Total: 26 Reporter Portal: 25 SFTP: 1	Total: 0 Reporter Portal: 0 SFTP: 0	Total: 0 Reporter Portal: 0 SFTP: 0
Number of Files Rejected	3	0	0	0	0	0	0
File Reject Rate	50.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Full CAIS Phase Statistics – July 10th – July 17th, 2022

Production Environment							
	Monday, 7/11	Tuesday, 7/12	Wednesday, 7/13	Thursday, 7/14	Friday, 7/15	Saturday, 7/16	Sunday, 7/17
FDID Records Accepted	59	82	16	10	7	0	0
FDID Records Rejected	0	0	0	0	0	0	0
FDID Records Submitted	59	82	16	10	7	0	0
FDID Record Rejection Rate	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Full CAIS Phase Statistics – July 10th – July 17th, 2022

Production Environment							
	Monday, 7/11	Tuesday, 7/12	Wednesday, 7/13	Thursday, 7/14	Friday, 7/15	Saturday, 7/16	Sunday, 7/17
Customer Records Accepted	13	82	16	10	7	0	0
Customer Records Rejected	0	0	0	0	0	0	0
Customer Records Submitted	13	82	16	10	7	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 • CAIS File not Readable • Missing or invalid counts of FDIDs, Natural Person Customers, or Legal Entity Customers • Missing or invalid file *version*
FDID	• FDID rejected because Customer was rejected or no customer was associated to the FDID • Missing ADDRESS1 type Address Record • Missing *fdidCustomerList* • Missing/invalid format of *postalCode*
Customer	• Customer rejected because FDID was rejected or customer was not associated to an FDID • Legal Entity customer reported with improper *tidType* • Customer has an open material inconsistency and *updateNotification* was not set as true • Multiple instances of customer with differing data

Open Issues, Planned Enhancements, and Specification Updates

CAT Full CAIS Open Issues List – As of 7/20/2022 Release Planned/Workaround Provided

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production Environment Targeted Release Date/Workaround	Area Affected
1	Open	22041	Instances of CAIS Data feedback containing 22041 errors when the *customerRecordID* is present in the file on either a Natural Person or Legal Entity customer record, and the same *customerRecordID* 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
2	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
3	NEW - Open	N/A	Intermittent instances where feedback file versions are not correctly being generated for a submission. Final feedback is provided including all status transitions, however one or more feedback file versions contain duplicate status values.	Code Release	Low	**Fix**: 9/12/22	**Fix**: 9/26/22	Feedback Files

CAT Full CAIS Recently Closed Issues List
As of 7/20/2022

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production Environment Targeted Release Date/Workaround	Area Affected
1	Closed	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 *customerRecordID* 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.	Code Release	High	**Fix:** Deployed 7/12/2022	**Fix:** Deployed 7/15/2022	Feedback and Reporter Portal

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	23999	Increase the current 100 Customer Record limit on number of CAT Customers that can be associated with an FDID Record. The increased limit will allow 2,000 Customer Records to be associated to the FDID.	Code Release	High	**Fix:** 7/31/2022	**Fix:** 8/8/2022	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 *fdidEndReason* 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 *fdidEndReason* of 'INACTIVE' populated and an *fdidEndDate* set on or before the date of the report.	3/9/2022	2.0r7	TBD	TBD
2	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
3	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
4	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
5	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
6	Open	Clarify that a total of 2,000 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	7/31/2022	8/8/2022
7	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

* 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	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
9	Open	Remove *submissionStatus* from Submission Inconsistencies Feedback File.	TBD	2.0 r10	TBD	TBD
10	Open	Remove error code 22066 (*roleStartDate* set prior to *fdidDate*).	TBD	2.0 r10	7/31/2022	8/8/2022

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

General Announcements and Reminders

CAT Alert

- [CAT Alert 2022-01](#) was published to the CAT NMS Plan website on 7/12.

- Alert includes the Phase 2e (Full CAIS) reporting timeline and interim reporting obligations.

Full CAIS Phase Reporting Certification

➢ Full CAIS Phase Certification is **required by July 25, 2022**.

➢ There are currently **950** firms certified for Full CAIS reporting.

➢ Certification is detailed in the [Industry Member CAIS Onboarding Guide](.).

FINRA CAT Announcements and Reminders

- CAT CAIS Checkpoint Calls are being held weekly. The next call will be on July 27th.

- 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

CAIS LTID Phase Statistics – July 10th – July 17th, 2022

Production Environment							
	Monday, 7/11	**Tuesday, 7/12**	**Wednesday, 7/13**	**Thursday, 7/14**	**Friday, 7/15**	**Saturday, 7/16**	**Sunday, 7/17**
Number of Total Submitters	50	59	60	56	57	20	3
Number of Unique Firms	260	492	521	482	477	247	3
Number of Files Received	Total: 318 Reporter Portal: 42 SFTP: 276	Total: 928 Portal: 6 SFTP: 922	Total: 985 Portal: 24 SFTP: 961	Total: 965 Reporter Portal: 50 SFTP: 915	Total: 928 Reporter Portal: 18 SFTP: 910	Total: 655 Reporter Portal: 11 SFTP: 644	Total: 3 Reporter Portal: 0 SFTP: 3
Number of Files Rejected	0	2	22	3	2	1	0
File Reject Rate	0.00%	0.22%	2.23%	0.31%	0.22%	0.15%	0.00%

CAIS LTID Phase Statistics – July 10th – July 17th, 2022

Production Environment							
	Monday, 7/11	**Tuesday, 7/12**	**Wednesday, 7/13**	**Thursday, 7/14**	**Friday, 7/15**	**Saturday, 7/16**	**Sunday, 7/17**
Records Accepted	325,119	1,094,075	999,869	868,537	906,615	962,454	714
Records Rejected	13	46	27	65	54	13	0
Records Submitted	325,132	1,094,121	999,896	868,602	906,669	962,467	714
Record Rejection Rate	0.00%	0.00%	0.00%	0.01%	0.01%	0.00%	0.00%

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 *correctionAction* message	TBD	V1.2.3