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# Industry CAT CAIS Release Status

July 27th, 2022

# Agenda

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

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# **Industry CAT Full CAIS Release Update**

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# Industry Member Release Rollout – Pre-Full CAIS Production

<b>Full CAIS Release 1</b> Industry Test – 1/31/2022 Production – 4/25/2022	<b>Full CAIS Release 2a</b> Industry Test – 3/28/2022 Production – 4/25/2022	<b>Full CAIS Release 2b</b> Industry Test – 4/11/2022 Production – 4/25/2022
<p><b>Ingestion</b></p> <ul style="list-style-type: none"><li>• Industry Test Open for Machine-to-Machine File &amp; Data Integrity Validations, Material Inconsistencies, and Feedback</li><li>• Feedback file contains up to 1,000 Rejections</li></ul> <p><b>CAIS Reporter Portal</b></p> <ul style="list-style-type: none"><li>• Manual File Upload</li><li>• Manual Submission</li><li>• Submission Feedback</li><li>• Inconsistencies Feedback</li><li>• Nightly Inconsistencies Report</li></ul> <p><b>Full CAIS Certification</b> opened on 2/1/2022</p>	<p><b>Ingestion</b></p> <ul style="list-style-type: none"><li>• New DRIVERLICENSE Foreign TID Type</li><li>• EIN Validation changed to format validation</li><li>• Feedback file enhanced to include all Rejections feedback</li></ul> <p><b>CAIS Reporter Portal</b></p> <ul style="list-style-type: none"><li>• FDID Reconciliation Report updated with Full CAIS information (count of CAT Customers and Version information)</li></ul>	<p><b>Ingestion</b></p> <ul style="list-style-type: none"><li>• Remove OTHBKR and CP customerType values for Legal Entity Customer Records</li><li>• Remove BROKERAGE and ADVISED values for accountType</li><li>• Remove primeBrokerID and bankDepositoryID fields and add a new DVPCustodianID field</li></ul>

# 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 with the January Report Card published on February 15th, 2023
- Compliance Rates distinguished for Correspondent data

# Industry Member Release Rollout – Planned Future Enhancements

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Industry Test – TBD  
Production – TBD

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

# Full CAIS Phase Statistics – July 18<sup>th</sup> – July 24<sup>th</sup>, 2022

Industry Test Environment							
	Monday, 7/18	Tuesday, 7/19	Wednesday, 7/20	Thursday, 7/21	Friday, 7/22	Saturday, 7/23	Sunday, 7/24
Number of Total Submitters	28	44	50	51	43	8	7
Number of Unique Firms	40	246	270	247	254	95	7
Number of Files Received	Total: 135 Reporter Portal: 96 SFTP: 39	Total: 987 Reporter Portal: 87 SFTP: 900	Total: 1,177 Reporter Portal: 176 SFTP: 1,001	Total: 1,092 Reporter Portal: 169 SFTP: 923	Total: 3,416 Reporter Portal: 133 SFTP: 3,283	Total: 1,403 Reporter Portal: 6 SFTP: 1,397	Total: 13 Reporter Portal: 10 SFTP: 3
Number of Files Rejected	23	19	59	42	35	22	1
File Reject Rate	17.04%	1.93%	5.01%	3.85%	1.02%	1.60%	7.70%

# Full CAIS Phase Statistics – July 18<sup>th</sup> – July 24<sup>th</sup>, 2022

## Industry Test Environment

	Monday, 7/18	Tuesday, 7/19	Wednesday, 7/20	Thursday, 7/21	Friday, 7/22	Saturday, 7/23	Sunday, 7/24
FDID Records Accepted	370,761	631,682	584,551	1,012,387	969,252	597,865	1,345
FDID Records Rejected	13,582	66,137	101,204	52,324	2,687,138	47,113	750
FDID Records Submitted	384,343	697,819	685,755	1,064,711	3,656,390	644,978	2,095
FDID Record Rejection Rate	3.53%	9.48%	14.76%	4.91%	73.49%	7.30%	35.80%



# Full CAIS Phase Statistics – July 18<sup>th</sup> – July 24<sup>th</sup>, 2022

## Industry Test Environment

	Monday, 7/18	Tuesday, 7/19	Wednesday, 7/20	Thursday, 7/21	Friday, 7/22	Saturday, 7/23	Sunday, 7/24
Customer Records Accepted	94,572	431,188	350,181	976,355	1,000,539	886,881	1,315
Customer Records Rejected	9,225	94,727	125,284	67,017	3,369,606	51,633	651
Customer Records Submitted	103,797	525,915	475,465	1,043,372	4,370,145	938,514	1,966
Customer Record Rejection Rate	8.89%	18.01%	26.35%	6.42%	77.11%	5.50%	33.11%

# Full CAIS Phase Statistics – July 18<sup>th</sup> – July 24<sup>th</sup>, 2022

## Production Environment

	Monday, 7/18	Tuesday, 7/19	Wednesday, 7/20	Thursday, 7/21	Friday, 7/22	Saturday, 7/23	Sunday, 7/24
Number of Total Submitters	2	6	2	5	5	0	0
Number of Unique Firms	2	6	2	5	5	0	0
Number of Files Received	Total: 2 Reporter Portal: 1 SFTP: 1	Total: 126 Reporter Portal: 125 SFTP: 1	Total: 3 Reporter Portal: 2 SFTP: 1	Total: 14 Reporter Portal: 13 SFTP: 1	Total: 6 Reporter Portal: 5 SFTP: 1	Total: 0 Reporter Portal: 0 SFTP: 0	Total: 0 Reporter Portal: 0 SFTP: 0
Number of Files Rejected	0	0	0	1	1	0	0
File Reject Rate	0.00%	0.00%	0.00%	7.14%	16.67%	0.00%	0.00%

# Full CAIS Phase Statistics – July 18<sup>th</sup> – July 24<sup>th</sup>, 2022

## Production Environment

	Monday, 7/18	Tuesday, 7/19	Wednesday, 7/20	Thursday, 7/21	Friday, 7/22	Saturday, 7/23	Sunday, 7/24
FDID Records Accepted	2	126	3	14	8	0	0
FDID Records Rejected	0	0	0	0	0	0	0
FDID Records Submitted	2	126	3	14	8	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 18<sup>th</sup> – July 24<sup>th</sup>, 2022

## Production Environment

	Monday, 7/18	Tuesday, 7/19	Wednesday, 7/20	Thursday, 7/21	Friday, 7/22	Saturday, 7/23	Sunday, 7/24
Customer Records Accepted	2	124	3	14	7	0	0
Customer Records Rejected	0	0	0	0	0	0	0
Customer Records Submitted	2	124	3	14	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

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Rejection Source	Top Rejection Reasons
File	<ul style="list-style-type: none"><li>• CAIS File not Readable</li><li>• Missing or invalid file <i>version</i></li><li>• Paired Identifiers File not received</li><li>• Invalid CAIS file name</li><li>• Missing or Invalid CAT Submitter ID</li></ul>
FDID	<ul style="list-style-type: none"><li>• FDID rejected because Customer was rejected or no customer was associated to the FDID</li><li>• Missing or invalid <i>countryCode</i></li><li>• Missing ADDRESS1 type Address Record</li><li>• No Customer association with trading capabilities</li></ul>
Customer	<ul style="list-style-type: none"><li>• Customer rejected because FDID was rejected or another version of customer was rejected</li><li>• Missing or invalid <i>countryCode</i></li><li>• <i>customerRecordID</i> not present in paired TIDs file</li><li>• Legal Entity CAT Customer reported with improper <i>tidType</i></li></ul>

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# Open Issues, Planned Enhancements, and Specification Updates

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# CAT Full CAIS Open Issues List – As of 7/27/2022

## 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	Updated - 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: 9/12/22	Fix: 9/26/22	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	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 Open Issues List – As of 7/27/2022

## Release Planned/Workaround Provided

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production Environment Targeted Release Date/Workaround	Area Affected
4	NEW – Open	N/A	Large files containing over 15 million records failed to complete processing.	Code Release	High	<b>Fix:</b> 7/31/22 - All single file sizes up to 40 million total records will process, however feedback may be delayed for files with greater than 5 million records.	<b>Workaround:</b> Limit file size to the Specification guideline of 1GB and/or 2 million total records (FDID and Customer)  <b>Fix:</b> 8/8/22 - All single file sizes up to 40 million total records will process, however feedback may be delayed for files with greater than 5 million records.	Validation
5	NEW – Open	N/A	The <i>customerRecordID</i> attribute within each of the 3 submission feedback files should be an array of unsigned values rather than a single unsigned value.	Code Release	Medium	<b>Fix:</b> TBD	<b>Workaround:</b> All affected <i>customerRecordIDs</i> are displayed within the CAIS Reporter Portal UI.  <b>Fix:</b> TBD	Feedback Files
6	NEW – Open	N/A	Within the CAIS Reporter Portal Submission Report, counts of customer records repaired and outstanding are counted by TID rather than <i>customerRecordID</i> . Repaired and outstanding rejections counts may not match the count of records rejected.	Code Release	Low	<b>Fix:</b> No later than 9/12/22	<b>Fix:</b> No later than 9/26/22	Submission Report
7	NEW – Open	22042	A single customer cannot currently have a new role which starts on the same date that a previous role was ended.	Code Release	High	<b>Fix:</b> 7/31/22	<b>Fix:</b> 8/8/22	Validation



# CAT Full CAIS Recently Closed Issues List

## As of 7/27/2022

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

# 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	<b>Workaround:</b> 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 <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	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 <i>submissionStatus</i> from Submission Inconsistencies Feedback File.	TBD	2.0 r10	TBD	TBD
10	Open	Remove error code 22066 ( <i>roleStartDate</i> set prior to <i>fdidDate</i> ).	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.

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# General Announcements and Reminders

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# Full CAIS Phase Reporting Certification

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- Full CAIS Phase Certification was **July 25, 2022**.
- There are currently **1,254** firms certified for Full CAIS reporting.
- Certification is detailed in the [Industry Member CAIS Onboarding Guide](#).

# CAT Submitters – Partial Submissions

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- As outlined in [CAT Alert 2022-01](#), beginning August 1, 2022, FINRA CAT will contact Full CAIS Submitters (i.e., self-reporting firms and CAT Reporting Agents that report to CAIS on behalf of Industry Members) to schedule a single partial submission on a single date to the Production Environment in Full CAIS format. Schedule dates are between August 15, 2022 to September 15, 2022.
- FINRA CAT will send an email to CAT Submitters on August 1, 2022.
- FINRA CAT will follow up with a phone call; and
- FINRA CAT will contact the Points of Contact listed on the CAIS Registration Form, as well as the CCO and Regulatory Inquiries contacts provided in the FINRA contact system.



# FINRA CAT Announcements and Reminders

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- CAT CAIS Checkpoint Calls are being held weekly. The next call will be on August 3<sup>rd</sup>.
- Connectivity Guides, Reporting Scenarios, Use Cases, and updated FAQs available at [catnmsplan.com](http://catnmsplan.com)

# FINRA CAT Helpdesk

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Questions may be directed to the FINRA CAT Helpdesk at 888-696-3348 or [help@finracat.com](mailto:help@finracat.com)

# How to Ask a Question during Today's Call

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

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# Appendix A: Industry CAT CAIS LTID Release Update

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# CAIS LTID Phase Statistics – July 18<sup>th</sup> – July 24<sup>th</sup>, 2022

Production Environment							
	Monday, 7/18	Tuesday, 7/19	Wednesday, 7/20	Thursday, 7/21	Friday, 7/22	Saturday, 7/23	Sunday, 7/24
Number of Total Submitters	46	62	57	55	60	18	4
Number of Unique Firms	260	527	535	493	489	271	4
Number of Files Received	Total: 285 Reporter Portal: 7 SFTP: 278	Total: 1,042 Portal: 60 SFTP: 982	Total: 1,074 Portal: 106 SFTP: 968	Total: 976 Reporter Portal: 56 SFTP: 920	Total: 1,026 Reporter Portal: 75 SFTP: 951	Total: 665 Reporter Portal: 0 SFTP: 665	Total: 14 Reporter Portal: 11 SFTP: 3
Number of Files Rejected	2	23	23	22	3	2	0
File Reject Rate	0.71%	2.21%	2.14%	2.25%	0.29%	0.30%	0.00%

# CAIS LTID Phase Statistics – July 18<sup>th</sup> – July 24<sup>th</sup>, 2022

## Production Environment

	Monday, 7/18	Tuesday, 7/19	Wednesday, 7/20	Thursday, 7/21	Friday, 7/22	Saturday, 7/23	Sunday, 7/24
Records Accepted	320,164	1,057,659	1,145,322	1,081,698	1,035,603	528,814	174,805
Records Rejected	10	67	198	60	48	18	0
Records Submitted	320,174	1,057,726	1,145,520	1,081,758	1,035,651	528,832	174,805
Record Rejection Rate	0.00%	0.01%	0.02%	0.01%	0.00%	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 <i>correctionAction</i> message	TBD	V1.2.3