Industry CAT CAIS Release Status

August 10th, 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 with the 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

Full CAIS Phase Statistics – August 1st – August 7th, 2022

		Industry Test Environment					
	Monday, 8/1	**Tuesday, 8/2**	**Wednesday, 8/3**	**Thursday, 8/4**	**Friday, 8/5**	**Saturday, 8/6**	**Sunday, 8/7**
Number of Total Submitters	26	35	38	36	28	6	4
Number of Unique Firms	43	235	244	108	249	149	4
Number of Files Received	Total: 127 Reporter Portal: 16 SFTP: 111	Total: 1,749 Reporter Portal: 21 SFTP: 1,728	Total: 1,441 Reporter Portal: 45 SFTP: 1,396	Total: 379 Reporter Portal: 37 SFTP: 342	Total: 3,584 Reporter Portal: 41 SFTP: 3,543	Total: 1,385 Reporter Portal: 0 SFTP: 1,385	Total: 4 Reporter Portal: 0 SFTP: 4
Number of Files Rejected	16	46	33	15	50	1	0
File Reject Rate	12.60%	2.63%	2.29%	3.96%	1.40%	0.07%	0.00%

Full CAIS Phase Statistics – August 1ˢᵗ – August 7ᵗʰ, 2022

Industry Test Environment							
	Monday, 8/1	**Tuesday, 8/2**	**Wednesday, 8/3**	**Thursday, 8/4**	**Friday, 8/5**	**Saturday, 8/6**	**Sunday, 8/7**
FDID Records Accepted	371,466	3,210,272	5,745,018	323,790	2,885,563	558,051	30
FDID Records Rejected	11,081	323,596	4,515,764	32,234	122,684	17,729	3
FDID Records Submitted	382,547	3,533,868	10,260,782	356,024	3,008,247	575,780	33
FDID Record Rejection Rate	2.90%	9.16%	44.01%	9.05%	4.08%	3.08%	9.09%

Full CAIS Phase Statistics – August 1ˢᵗ – August 7ᵗʰ, 2022

Industry Test Environment							
	Monday, 8/1	**Tuesday, 8/2**	**Wednesday, 8/3**	**Thursday, 8/4**	**Friday, 8/5**	**Saturday, 8/6**	**Sunday, 8/7**
Customer Records Accepted	120,660	5,155,461	7,564,973	144,810	3,041,739	681,610	8
Customer Records Rejected	4,053	403,560	4,150,113	30,317	132,341	20,552	2
Customer Records Submitted	124,713	5,559,021	11,715,086	175,127	3,174,080	702,162	10
Customer Record Rejection Rate	3.25%	7.26%	35.43%	17.31%	4.17%	2.93%	20.00%

Full CAIS Phase Statistics – August 1st – August 7th, 2022

Production Environment							
	Monday, 8/1	**Tuesday, 8/2**	**Wednesday, 8/3**	**Thursday, 8/4**	**Friday, 8/5**	**Saturday, 8/6**	**Sunday, 8/7**
Number of Total Submitters	7	13	10	11	9	0	0
Number of Unique Firms	7	13	10	11	9	0	0
Number of Files Received	Total: 23 Reporter Portal: 21 SFTP: 2	Total: 23 Reporter Portal: 12 SFTP: 11	Total: 35 Reporter Portal: 30 SFTP: 5	Total: 36 Reporter Portal: 26 SFTP: 10	Total: 16 Reporter Portal: 10 SFTP: 6	Total: 0 Reporter Portal: 0 SFTP: 0	Total: 0 Reporter Portal: 0 SFTP: 0
Number of Files Rejected	3	3	3	4	0	0	0
File Reject Rate	13.04%	13.04%	8.57%	11.11%	0.00%	0.00%	0.00%

Full CAIS Phase Statistics – August 1st – August 7th, 2022

Production Environment							
	Monday, 8/1	Tuesday, 8/2	Wednesday, 8/3	Thursday, 8/4	Friday, 8/5	Saturday, 8/6	Sunday, 8/7
FDID Records Accepted	116	3,285	1,132	2,254	1,194	0	0
FDID Records Rejected	3	4	1	2	6	0	0
FDID Records Submitted	119	3,289	1,133	2,256	1,200	0	0
FDID Record Rejection Rate	2.52%	0.12%	0.09%	0.09%	0.50%	0.00%	0.00%

Full CAIS Phase Statistics – August 1st – August 7th, 2022

Production Environment							
	Monday, 8/1	**Tuesday, 8/2**	**Wednesday, 8/3**	**Thursday, 8/4**	**Friday, 8/5**	**Saturday, 8/6**	**Sunday, 8/7**
Customer Records Accepted	116	3,291	1,135	2,188	1,126	0	0
Customer Records Rejected	3	6	1	2	7	0	0
Customer Records Submitted	119	3,297	1,136	2,190	1,133	0	0
Customer Record Rejection Rate	2.52%	0.19%	0.09%	0.09%	0.62%	0.00%	0.00%

Full CAIS Phase Rejection Observations

Rejection Source	Top Rejection Reasons
File	• Duplicate file • Invalid CAIS File name • Paired Identifiers file not received • Missing or Invalid CAT Reporter CRD
FDID	• No Customer association with trading capabilities • FDID rejected because associated Customer was rejected • Multiple active roles for Customer within *fdidCustomerList* • No active Customer associations
Customer	• Customer rejected because FDID was rejected or another version of customer was rejected • Malformed TID value • Legal Entity Customer reported with improper *tidType* • Multiple instances of Customer with differing data • Missing or invalid format of *yearOfBirth*

Open Issues, Planned Enhancements, and Specification Updates

CAT Full CAIS Open Issues List – As of 8/10/2022 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**: 9/12/2022	**Fix**: 9/26/22	Data Validation
2	Updated - 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**: Deployed 7/31/22	**Fix**: 8/13/22	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**: 9/12/2022	**Fix**: 9/26/22	Feedback Files

*** The Known Issues List is published on www.catnmsplan.com under "Industry Member Specifications" ***

CAT Full CAIS Open Issues List – As of 8/10/2022 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	Updated – Open	N/A	Large files containing over 15 million records failed to complete processing.	Code Release	High	**Fix**: Deployed 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.	**Workaround:** Limit file size to the Specification guideline of 1GB and/or 2 million total records (FDID and Customer) **Fix**: 8/13/22 - 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	Updated - Open	N/A	Instances when an error occurs for a customer record where the same CAT customer is reported with multiple *customerRecordID* values, SFTP feedback will include only one of the *customerRecordIDs*. The portal feedback will include all *customerRecordIDs* related to the error.	Code Release	Medium	**Fix**: TBD	**Workaround**: All affected *customerRecordIDs* are displayed within the CAIS Reporter Portal UI. **Fix**: TBD	Feedback Files
6	Open	N/A	Within the CAIS Reporter Portal Submission Report, counts of customer records repaired and outstanding are counted by TID rather than *customerRecordID*. Repaired and outstanding rejections counts may not match the count of records rejected.	Code Release	Low	**Fix**: No later than 9/12/22	**Fix**: No later than 9/26/22	Submission Report
7	Updated - 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	**Fix**: Deployed 7/31/22	**Fix**: 8/13/22	Validation

*** The Known Issues List is published on www.catnmsplan.com under "Industry Member Specifications" ***

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CAT Full CAIS Open Issues List – As of 8/10/2022 Release Planned/Workaround Provided

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production Environment Targeted Release Date/Workaround	Area Affected
8	Open	N/A	The 365-day grace period is currently only provided for 'IMPACTED' inconsistencies. This fix will apply the grace period to 'TRIGOTHER' inconsistencies as well.	Code Release	Medium	**Fix**: TBD	**Workaround**: Provide *updateNotification*=true for each affected Customer record. **Fix**: TBD	Inconsistencies
9	Updated - Open	N/A	The *inconsistencyEventID* attribute within the Submission Inconsistencies Feedback File is not present for any inconsistency. However, this attribute is present within the CAIS Reporter Portal UI.	Code Release	High	**Fix**: 8/11/22	**Fix**: 8/13/22	Feedback Files
10	Updated - Open	N/A	The *customerRejectionEventID* attribute within the CAIS Data Feedback File is not present for rejections against customer records. However, this attribute is present within the CAIS Reporter Portal UI.	Code Release	Low	**Fix:** TBD	**Fix**: TBD	Feedback Files
11	Updated - Open	N/A	Files containing *postalCode* values that are not set as string data types do not result in the record being rejected but instead transition to an Incomplete Processing Failure status.	Code Release	High	**Fix**: 8/11/22	**Fix**: 8/13/22	Validation
12	NEW - Open	N/A	The Rejections and Inconsistencies pages may take longer than expected to load.	Code Release	High	**Fix**: TBD	**Fix**: TBD	Reporter Portal

CAT Full CAIS Open Issues List – As of 8/10/2022 Release Planned/Workaround Provided

#	Status	Error Code	Summary	Resolution	Priority	Test Environment Targeted Release Date/Workaround	Production Environment Targeted Release Date/Workaround	Area Affected
13	NEW - Open	N/A	Timestamps in the Nightly Inconsistencies Feedback File are in ISO format (e.g., 2022-08-01T23:29:29.971Z) instead of the Timestamp format prescribed in the CAIS Technical Specification.	Code Release	High	**Fix**: No later than 9/12/22	**Fix**: No later than 9/26/22	Inconsistencies
14	NEW - Open	N/A	The *reporterCRD* attribute within the Nightly Inconsistencies Feedback File is being output as a String data type instead of Unsigned.	Code Release	High	**Fix**: No later than 9/12/22	**Fix**: No later than 9/26/22	Inconsistencies
15	NEW - Open	N/A	Instances of rejections and inconsistencies not being repaired due to database load backlog.	Code Release	High	**Fix**: 9/12/22	**Fix**: 9/26/22	Error Repairs and Inconsistencies
16	NEW – Open	N/A	Duplicate rows are present in the downloaded file when downloading the Rejections table from the Reporter UI.	Code Release	Medium	**Fix**: TBD	**Fix**: TBD	Reporter UI
17	NEW – Open	22041, 22042, 22526	Incorrect error codes produced (22041, 22042) when a *customerRecordID* has an entry in the CAIS Data File but no entry in the TIDs File. 22526 is expected to be returned in this scenario.	Code Release	Medium	**Fix**: 9/12/22	**Fix**: 9/26/22	Feedback Files

CAT Full CAIS Recently Closed Issues List
As of 8/10/2022

#	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	**Workaround:** User may add the columns to their view. **Fix:** TBD	**Fix:** TBD	Reporter Portal
4	Updated - 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:** Deployed 7/31/2022	**Fix:** 8/13/2022	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
11	NEW – Open	Add warning code 24008 (Data Type Violation within *correctionList*) – present in LTID Specification but was not brought forward to the Full CAIS Specification.	TBD	2.0 r10	N/A	N/A

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

General Announcements and Reminders

Exemptive Relief Requests

➤ On June 30, 2022, the Plan Participants submitted to the SEC a request for exemptive relief from certain requirements in the CAT NMS Plan related to industry member reporting of customer and account information by July 11, 2022.

➤ With the requested extension of the CAIS Reporting Deadline, there is a period in which Industry Members are required to transition from LTID only reporting to Full CAIS reporting. On August 10, 2022, the Participants submitted to the SEC a request for temporary exemptive relief from certain reporting and processing requirements in the CAT NMS Plan related to Large Trader Identifiers (LTIDs) once an FDID is transitioned to Full CAIS Reporting.

CAT Submitters – Partial Submissions

➢ 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 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.

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 was **July 25, 2022**.

➢ There are currently **1,290** 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 August 17th.

➢ 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 – August 1ˢᵗ – August 7ᵗʰ, 2022

Production Environment							
	Monday, 8/1	**Tuesday, 8/2**	**Wednesday, 8/3**	**Thursday, 8/4**	**Friday, 8/5**	**Saturday, 8/6**	**Sunday, 8/7**
Number of Total Submitters	45	59	58	59	58	18	3
Number of Unique Firms	235	522	489	492	516	310	4
Number of Files Received	Total: 261 Reporter Portal: 16 SFTP: 245	Total: 1,040 Portal: 29 SFTP: 1,011	Total: 967 Portal: 36 SFTP: 931	Total: 962 Reporter Portal: 24 SFTP: 938	Total: 1,046 Reporter Portal: 46 SFTP: 1,000	Total: 725 Reporter Portal: 0 SFTP: 725	Total: 7 Reporter Portal: 0 SFTP: 7
Number of Files Rejected	3	15	11	4	5	0	0
File Reject Rate	1.15%	1.44%	1.14%	0.42%	0.48%	0.00%	0.00%

CAIS LTID Phase Statistics – August 1st – August 7th, 2022

Production Environment							
	Monday, 8/1	**Tuesday, 8/2**	**Wednesday, 8/3**	**Thursday, 8/4**	**Friday, 8/5**	**Saturday, 8/6**	**Sunday, 8/7**
Records Accepted	353,460	1,190,584	1,081,637	1,094,401	1,147,245	828,061	508
Records Rejected	8	60	76	36	70	36	0
Records Submitted	353,468	1,190,644	1,081,713	1,094,437	1,147,315	828,097	508
Record Rejection Rate	0.00%	0.00%	0.00%	0.00%	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 *correctionAction* message	TBD	V1.2.3